PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Grote Industries, LLC.
2600 Lanier Drive
Madison, IN 47250

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T077-7670-00003	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 18, 2001 Expiration Date: April 18, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary plastic and metal automotive parts manufacturing plant.

Responsible Official:	Plant Manager
Source Address:	2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address:	PO Box 1550, Madison, Indiana, 47250
SIC Code:	3647
County Location:	Jefferson County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One Plastic Painting Process consisting of the following emission units:

(1) One (1) Spray HSML and Plastic Parts Booth, identified as emission unit 78 and installed in 1983, with a maximum unit capacity of one-thousand two-hundred (1200) pieces per hour, using dry filters as control, and exhausting to stack 3-36.

(2) One (1) Hand Spray Plastic Parts Booth, identified as emission unit 79 and installed in 1989, with a maximum capacity of two-hundred fifty (250) pieces per hour, using dry filters as control, and exhausting to stack 3-35.

(3) One (1) Upspray Machine Plastic Parts Booth, identified as emission unit 81 and installed in 1986, with a maximum unit capacity of three-hundred (300) pieces per hour, using dry filters as control, and exhausting to stack 3-34.

(b) One metal painting Process consisting of the following emission units:

(1) One (1) Paint Spray Booth #1, identified as emission unit 82 and installed in 1976, with a maximum unit capacity of two-thousand seven-hundred fifty (2750) pieces per hour, using a water wash curtain as control, and exhausting to stack 1-48.

(2) One (1) Paint Spray Booth #2, identified as emission unit 83 and installed in 1976, with a maximum unit capacity of two-thousand seven-hundred fifty (2750) pieces per hour, using a water wash curtain as control, and exhausting to stack 1-49.

(3) One (1) Paint Spray Booth #3, identified as emission unit 84 and installed in 1976, with a maximum unit capacity of two-thousand seven-hundred fifty (2750) pieces

per hour, using both dry filters and a water wash curtain as controls, and exhausting to stack 1-50.

(c) One (1) Closed Top Solvent-based Mask Washer, identified as emission unit 129 and installed in 1994, with a batch process maximum unit capacity varying from two (2) to one-hundred (100) pieces per hour, exhausting to stacks 3-38 and 3-39.

(d) One (1) Robot Plastic Parts Paint Spray Booth, identified as emission unit 167, installed in 2000, with a maximum capacity of 600 units per hour, exhausting to stack 3-45 and utilizing dry filters as a control device.

(e) One (1) Paint Stripper Tank, identified as emission unit 192, constructed in 1974, and exhausting to stack 1-43. This unit does not have specifically applicable requirements.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) The following activities have potential uncontrolled emissions equal to or less than the insignificant thresholds described in 326 IAC 2-7-1(21):

(1) One (1) Injection Molding Process, consisting of twenty-nine (29) emission units, identified as emission units 57 through 64, 67, 69, 70, 74, 75, 76, 139 through 142, and 169 through 179, the process consists of vertical and horizontal molding using many different thermoplastic, and other similar materials. The process has a total maximum capacity of three-thousand four-hundred and fifty (3,450) tons of molded product per year, and exhausting through in-plant filtration. [326 IAC 6-3-2(c)]

(2) Twenty-nine (29) PVC Plug Molders, identified as emission units 26-54, with a maximum unit capacity of four-hundred eighty (480) pieces per hour and exhausting through in-plant filtration. [326 IAC 6-3-2(c)]

(3) Eighteen (18) Metal Presses, identified as emission units 2 through 10 and 16 through 24, exhausting through in-plant filtration. [326 IAC 6-3-2(c)]

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(c)]

(1) Eighteen (18) soldering stations, identified as emission units 85-90, 92-95, 98, 138, and 180-185, each with a maximum unit capacity of three hundred (300) pieces per hour, and exhausting to stacks 1-7, 1-9, 1-58, 2-4, 2-13, in-plant filtration, 1-16, 1-13, 1-9, and in-plant filtration, respectively.

(2) Two (2) Brazing Stations, identified as emission units 91 and 186, exhausting to stack 2-15 and through in-plant infiltration, respectively.

(3) One production welding operation, identified as emission unit 187.

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or

equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: Two (2) Maintenance Abrasive Blasters identified as emission units 143 and 160 exhausting through in-plant filtration [326 IAC 6-3-2(c)].

(d) Degreasing operations that each do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Five (5) cold cleaner degreasers, identified as emission units 150-154 with remote solvent reserviors, installed in 1998 or after [326 IAC 8-3-2].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B.12, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated

noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

C.9 Volatile Organic Compound and Particulate Matter [326 IAC 2-2] [40 CFR 52.21]

The total VOC emissions from the entire source shall be less than 250 tons per year. The total particulate matter emissions from the entire source shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C, (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee’s failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize

excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for

records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] One Plastic Painting Process consisting of the following emission units:

(a) One (1) Spray HMSL and Plastic Parts Booth, identified as emission unit 78 and installed in 1983, with a maximum unit capacity of one-thousand-two-hundred (1200) pieces per hour, using dry filters as control, and exhausting to stack 3-36.
(b) One (1) Hand Spray Plastic Parts Booth, identified as emission unit 79 and installed in 1989, with a maximum unit capacity of two-hundred-fifty (250) pieces per hour, using dry filters as control and exhausting to stack 3-35.
(c) One (1) Upspray Machine Plastic Parts Booth, identified as emission unit 81 and installed in 1986, with a maximum capacity of three-hundred (300) pieces per hour, using dry filters as control, and exhausting to stack 3-34.

(This information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from each of the three (3) paint booths (EU 78, 79, 81) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]

The input of VOC to the plastic parts surface coating booths (EU78, EU79, and EU81), installed after January 1, 1980, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus any solvent shipped out. This usage limit is required to limit the potential to emit of VOC to less than twenty five (25) tons per twelve (12) consecutive month period from each booth. Compliance with this limit makes 326 IAC 8-1-6 (Best Available Control Technology) not applicable.

Compliance with this limit shall also render 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and Particulate Matter limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the corresponding booth(s) is/are in operation for the three (3) paint booths (EU 78, 79, 81).

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.7 Volatile Organic Compound Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage minus any solvents shipped out for the twelve (12) consecutive month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (3-34, 3-35, 3-36) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the permittee shall maintain records in accordance with one (1) through nine (9) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2, and to

document the quantity of any VOC shipped offsite and deducted from total reported VOC usage.

(1) The amount and VOC content of each coating material and solvent used shall be recorded. Records shall include material safety data sheets (MSDS) and other records necessary to verify the type and amount used that may include purchase orders and invoices. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The quantity of cleanup solvent shipped out each month. Non-VOC waste shall not be commingled with VOC containing waste, if the VOC content of waste shipped offsite is deducted from the reported monthly VOC usage.

(3) A log of the dates of use;

(4) The volume weighted VOC content of the coatings used for each month;

(5) The cleanup solvent for each month;

(6) The total VOC usage for each month;

(7) The weight of VOCs emitted for each compliance period; and

(8) The results of the laboratory analysis of the VOC content of the solvent collected and drummed for disposal offsite. A representative sample of the VOC solvent to be shipped offsite shall be analyzed each quarter if the solvent VOC content is deducted from the monthly VOC usage reported. After one year from the issuance date of this permit the source may request to have the frequency of analysis changed. Volatile Organic Compound (VOC) is defined in 326 IAC 1-2-90.

(9) Records used to determine VOC use shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and any additional information necessary to determine the VOC content, and the date of use. The laboratory analysis of the representative VOC content and the quantity of the solvent collected and drummed for disposal offsite shall be used to determine the VOC shipped offsite, if the solvent VOC content is deducted from the monthly VOC usage reported.

(b) To document compliance with condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC content of the solvent collected and drummed for disposal offsite shall be reported in each quarterly report if the solvent VOC content is deducted from the monthly VOC usage report. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One Metal Painting Process consisting of the following emission units:

(a) One (1) Paint Spray Booth #1, identified as emission unit 82 and installed in 1976, with a maximum unit capacity of two-thousand seven-hundred fifty (2750) pieces per hour, using a water wash curtain as control, and exhausting to stack 1-48.
(b) One (1) Paint Spray Booth #2, identified as emission unit 83 and installed in 1976, with a maximum unit capacity of two-thousand seven-hundred fifty (2750) pieces per hour, using a water wash curtain as control, and exhausting to stack 1-49.
(c) One (1) Paint Spray Booth #3, identified as emission unit 84 and installed in 1976, with a maximum unit capacity of two thousand seven-hundred fifty (2750) pieces per hour, using both dry filters and a water wash curtain as controls, and exhausting to stack 1-50.

(This information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Organic Solvent Emission Limitations [326 IAC 8-6-2(a)]

The input of VOC to the metal parts paint spray booths, emission units 82-84, installed after October 7, 1974, and prior to January 1, 1980, shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus any VOC solvent shipped out. This usage limit is required to limit the potential to emit of VOC to less than one-hundred tons per twelve (12) consecutive month period total for all three (3) booths. Compliance with this limit makes 326 IAC 8-6-2 (Organic Solvent Emission Limitations) not applicable.

Compliance with this limit shall also render 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from each of the three paint booths (82, 83, 84) shall not exceed the pound per hour emission rate established as E in the following formula:

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The water wash curtain (EU 82, 83, and 84) and dry filters (EU 84) shall be in operation at all times the surface coating booth is in operation, in order to comply with this limit.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and Particulate Matter limit specified in Condition D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.2.6 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage minus any solvents shipped out for the twelve (12) consecutive month period.

D.2.7 Particulate Matter (PM)

(a) In order to comply with D.2.2, the water wash curtain for PM control shall be in operation at all times when the corresponding paint booths (EU 82, and 83) are in operation.

(b) In order to comply with D.2.2, the water wash curtain and dry filters for PM control shall be in operation at all times when the one (1) paint booth (EU 84) is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. Daily inspections shall be performed to insure the liquid flow rate will produce uniform water curtains. To monitor the performance of the dry filters and water wash curtains, weekly observations shall be made of the overspray from the surface coating booth stacks (1-48, 1-49, 1-50) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C- Compliance Monitoring Plan-Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventative measures shall be performed as prescribed in the Preventative Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with one (1) through nine (9) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1; and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage.

(1) The amount and VOC content of each coating material and solvent used shall be recorded. Records shall include material safety data sheets (MSDS) and other records necessary to verify the type and amount used that may include purchase orders and invoices. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The quantity of cleanup solvent shipped out each month. Non-VOC waste shall not be commingled with VOC containing waste, if the VOC content of waste shipped offsite is deducted from the reported monthly VOC usage.

(3) A log of the dates of use;

(4) The volume weighted VOC content of the coatings used for each month;

(5) The cleanup solvent usage for each month;

(6) The total VOC usage for each month, and;

(7) The weight of VOCs emitted for each compliance period.

(8) The results of the laboratory analysis of the VOC content of the solvent collected and drummed for disposal offsite. A representative sample of the VOC solvent to be shipped offsite shall be analyzed each quarter if the solvent VOC content is deducted from the monthly VOC usage reported. After one year from the issuance date of this permit the source may request to have the frequency of analysis changed. Volatile Organic Compound (VOC) is defined in 326 IAC 1-2-90.

(9) Records used to determine VOC use shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and any additional information necessary to determine the VOC content, and the date of use. The laboratory analysis of the representative VOC content and the quantity of the solvent collected and drummed for disposal offsite shall be used to determine the VOC shipped offsite, if the solvent VOC content is deducted from the monthly VOC usage reported.

(b) To document compliance with condition D.2.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC content of the solvent collected and drummed for disposal offsite shall be reported in each quarterly report if the solvent VOC content is deducted from the monthly VOC usage report. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) Closed Top Solvent-based Mask Washer, identified as emission unit 129 and installed in 1994, with a batch process maximum unit capacity varying from two (2) to one-hundred (100) pieces per hour, exhausting to stacks 3-38 and 3-39.

(This information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Cold Cleaner Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the owner or operator of a cold cleaning facility shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operating requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at

thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and Particulate Matter limit specified in Condition D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) Robot Plastic Parts Paint Spray Booth, identified as emission unit 167, installed in 2000, with a maximum capacity of 600 units per hour, exhausting to stack 3-45 and utilizing dry filters as a control device.

(This information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Maximum Achievable Control Technology [326 IAC 2-4.1-1]

Hazardous Air Pollutants (HAPs) shall be limited to less than ten (10) tons per twelve (12) consecutive months for a single HAP and less than twenty-five (25) tons per twelve (12) consecutive months for any combination of HAPs. Compliance with this limit shall render 326 IAC 2-4.1-1 (Maximum Achievable Control Technology) and 40 CFR 63.43 (Maximum Achievable Control Technology) not applicable.

D.4.2 Best Available Control Technology [326 IAC 8-1-6]

The input of VOC to the plastic parts surface coating booth, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus any VOC solvent shipped out. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from the booth. Compliance with this limit shall render 326 IAC 8-1-6 (Best Available Control Technology) not applicable. Compliance with this VOC limit will also render 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.

D.4.3 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from the plastic parts surface coating booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

The dry filters shall be in operation at all times the surface coating booths is in operation, in order to comply with this limit.

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and Particulate Matter limit specified in Condition D.4.1, D.4.2, and D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.6 HAP Emissions

Compliance with Condition D.4.1 shall be demonstrated at the end of each month based on the total HAP usage minus any solvents shipped out for the most recent twelve (12) consecutive month period.

D.4.7 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.4.8 VOC Emissions

Compliance with Condition D.4.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage minus any solvents shipped out for the twelve (12) consecutive month period.

D.4.9 Particulate Matter (PM)

In order to comply with D.4.3, the dry filters for PM control shall be in operation at all times when the one (1) Robot Spray paint booth is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (3-45) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C- Compliance Monitoring Plan-Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventative measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.11 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records including the amount and HAP content of each coating material and solvent used shall be recorded. Records shall include material safety data sheets (MSDS) and other records necessary to verify the type and amount used that may include purchase orders and invoices. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents, a log of the dates of use, and the total HAP usage for the month. Records used to determine VOC and HAP use shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and any additional information necessary to determine the VOC and HAP content, and the date of use. The laboratory analysis of the representative VOC content and the quantity of the solvent collected and drummed for disposal offsite shall be used to determine the VOC shipped offsite, if the solvent VOC content is deducted from the monthly VOC usage reported.

(b) To document compliance with Condition D.4.2, the Permittee shall maintain records in accordance with one (1) through eight (8) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.2; and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage.

(1) The amount and VOC content of each coating material and solvent used shall be recorded. Records shall include material safety data sheets (MSDS) and other records necessary to verify the type and amount used that may include purchase orders and invoices. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The quantity of cleanup solvent shipped out each month. Non-VOC waste shall not be commingled with VOC containing waste, if the VOC content of waste shipped offsite is deducted from the reported monthly VOC usage.

(3) A log of the dates of use;

(4) The volume weighted VOC content of the coatings used for each month;

(5) The cleanup solvent usage for each month;

(6) The total VOC usage for each month, and;

(7) The weight of VOCs emitted for each compliance period.

(8) The results of the laboratory analysis of the VOC content of the solvent collected and drummed for disposal offsite. A representative sample of the VOC solvent to be shipped offsite shall be analyzed each quarter if the solvent VOC content is deducted from the monthly VOC usage reported. After one year from the issuance date of this permit the source may request to have the frequency of analysis changed. Volatile Organic Compound (VOC) is defined in 326 IAC 1-2-90.

(c) To document compliance with condition D.4.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.4.1 and D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC content of the solvent collected and drummed for disposal offsite shall be reported in each quarterly report if the solvent VOC content is deducted from the monthly VOC usage report. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

(a) The following activities have potential uncontrolled emissions equal to or less than the insignificant thresholds described in 326 IAC 2-7-1(21):

(1) One (1) Injection Molding Process, consisting of twenty-nine (29) emission units, identified as emission units 57 through 64, 67, 69, 70, 74, 75, 76,139 through 142, and 169 through 179, the process consists of vertical and horizontal molding using many different thermoplastic, and other similar materials. The process has a total maximum capacity of three-thousand four-hundred and fifty (3,450) tons of molded product per year, and exhausting through in-plant filtration. [326 IAC 6-3-2(c)]

(2) Twenty-nine (29) PVC Plug Molders, identified as emission units 26-54, with a maximum unit capacity of four-hundred eighty (480) pieces per hour and exhausting through in-plant filtration. [326 IAC 6-3-2(c)]

(3) Eighteen (18) Metal Presses, identified as emission units 2 through 10 and 16 through 24, exhausting through in-plant filtration. [326 IAC 6-3-2(c)]

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(c)]

(1) Eighteen (18) soldering stations, identified as emission units 85-90, 92-95, 98, 138, and 180-185, each with a maximum unit capacity of three hundred (300) pieces per hour, and exhausting to stacks 1-7, 1-9, 1-58, 2-4, 2-13, in-plant filtration, 1-16, 1-13, 1-9, and in-plant filtration, respectively.

(2) Two (2) Brazing Stations, identified as emission units 91 and 186, exhausting to stack 2-15 and through in-plant infiltration, respectively.

(3) One production welding operation, identified as emission unit 187.

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations: Two (2) Maintenance Abrasive Blasters identified as emission units 143 and 160 exhausting through in-plant filtration [326 IAC 6-3-2(c)].

(d) Degreasing operations that each do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Five (5) cold cleaner degreasers, identified as emission units 150-154 with remote solvent reserviors, installed in 1998 or after [326 IAC 8-3-2].

(This information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2 (c)]

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the Injection Molding Process, PVC Plug Molders, Soldering Stations, Brazing Station, Metal Presses, Abrasive Blasters, and welding operation shall each not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished y the use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

D.5.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the owner or operator of a cold cleaning facility shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operating requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and Particulate Matter limit specified in Condition D.5.1 and D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements

There are no applicable compliance monitoring requirements.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, IN 47250
Mailing Address: PO Box 1550, Madison, IN 47250
Part 70 Permit No.: T077-7670-00003

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003
Facility: Plastic Parts Painting Booth, Emission Unit 78
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 25 tons/12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 5
	Total VOC This Month	VOC Drummed for Offsite Disposal This Month	VOC Usage This Month (Column 1 - Column 2)	Previous 11 Months	12 Month Total (Column 3 + Column 4)
1					
2					
3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003
Facility: Hand Spray Plastic Parts Booth, Emission Unit 79
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 25 tons/12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 5
	Total VOC This Month	VOC Drummed for Offsite Disposal This Month	VOC Usage This Month (Column 1 - Column 2)	Previous 11 Months	12 Month Total (Column 3 + Column 4)
1					
2					
3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003
Facility: Upspray Machine Plastic Parts Booth, Emission Unit 81
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 25 tons/12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 5
	Total VOC This Month	VOC Drummed for Offsite Disposal This Month	VOC Usage This Month (Column 1 - Column 2)	Previous 11 Months	12 Month Total (Column 3 + Column 4)
1					
2					
3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003
Facility: Metal Surface Coating Process, Emission Units 82-84
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 100 tons total per 12 consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 5
	Total VOC This Month	VOC Drummed for Offsite Disposal This Month	VOC Usage This Month (Column 1 - Column 2)	Previous 11 Months	12 Month Total (Column 3 + Column 4)
1					
2					
3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003
Facility: Robot Plastic Parts Spray Booth
Parameter: HAPs
Limit: Less than 10 tons per twelve (12) consecutive months any single HAP and less than 25 tons per twelve (12) consecutive months any combination of HAPs

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 5
	Total HAP This Month	HAP Drummed for Offsite Disposal This Month	HAP Usage This Month (Column 1 - Column 2)	Previous 11 Months	12 Month Total (Column 3 + Column 4)
1					
2					
3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003
Facility: Robot Plastic Parts Spray Booth
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 25 tons per twelve (12) consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 5
	Total VOC This Month	VOC Drummed for Offsite Disposal This Month	VOC Usage This Month (Column 1 - Column 2)	Previous 11 Months	12 Month Total (Column 3 + Column 4)
1					
2					
3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Grote Industries, LLC
Source Location:	2600 Lanier Drive, Madison, Indiana 47250
County:	Jefferson County
SIC Code:	3647
Operation Permit No.:	T077-7670-00003
Permit Reviewer:	ERG/JC

On April 20, 1999, the Office of Air Quality (OAQ) had a notice published in the Madison Courier, Madison, Indiana, stating that Grote Industries, LLC had applied for a Part 70 Operating Permit to operate a stationary source that manufacturers plastic and metal automotive parts. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Responses to EPA Comments

On May 21, 1999, the EPA submitted comments on the proposed Part 70 permit. The following is a summary of the comments. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted. The Table of Contents has been modified to reflect these changes.

Comment 1:

Page 4 of the TSD refers to a section titled “Unpermitted Emission Units and the Pollution Control Equipment Requiring ENSR”, but the section on page 1 does not mention ENSR.

Response to Comment 1:

The reference to ENSR should not have been made in the original TSD. However, the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. No change was made as a result of this comment. The TSD should have read as follows:

(a) IDEM is aware that the equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment ~~Requiring ENSR~~.

Responses to Grote Industries' Comments

On May 19, 1999, Grote submitted comments on the proposed Part 70 permit. On November 30, 2000, additional comments were submitted. The following is a summary of the comments. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted. The Table of Contents has been modified to reflect these changes.

Comment 1: Revised Stack/Vent Identification Numbers

As part of its formal review of the previously submitted Title V application, Grote has identified several stack/vent inconsistencies such as equipment with no stacks being assigned stack identification numbers. Also, the stack identification scheme for the facility has undergone a complete reorganization and many stack identification numbers have changed. Grote has prepared an electronic plant layout showing all stacks/vents with their new identification numbers. Grote requests that the new stack/vent identification scheme be used in the Title V permit to allow for ease in location of stacks during facility inspections and maintenance activities.

Response to Comment 1:

The changes have been made with respect to the changing stack IDs throughout the permit. The following table will help in reference to the change of stack identification when it is referenced throughout the permit.

Emission	Description	Original TV Stack ID	Revised Stack ID
1-24	Metal Presses	2-20	No stack, in-plant filtration
25-54	Plug Molders	2-20	No stack, in-plant filtration
55-77	Injection Mold. Mach	2-20	No stack in-plant filtration
78	Spray HSML and Plastic	3-12	3-36
79	Hand Spray Plastic	3-11	3-35
81	Upspray Machine	3-16	3-34
82	Metal Spray #1	1-23	1-48
83	Metal Spray #2	1-24	1-49
84	Metal Spray #3	1-26	1-50
85	Solder Station	1-9	1-7
86	Solder Station	1-7	1-9
87	Solder Station	1-6	1-9
88	Solder Station	1-46	1-58
89	Solder Station	2-2	2-4
90	Solder Station	2-1	2-13
91	Brazing Station	2-8	2-15
92	Solder Station	2-12	No stack, in- plant filt. through fume extractor
93	Solder Station	2-13	No stack, in-plant filt. through fume extractor
94	Solder Station	2-20	No stack, in-plant filt. through fume extractor
95	Solder Station	2-20	No stack, in-plant filt. through fume extractor
96	Natural gas-BLR 1	1-10	1-4
97	Natural gas-BLR 1	1-11	1-5
98	Solder Station	1-50	1-16

Comment 2: Solvent-Based Mask Washer Hourly Capacity

The solvent-based mask washer (Emission Unit 129) is a batch process that is used to clean different parts with various sizes. This mask washer was installed in April 1994 and is exhausted by Stacks 3-38 and 3-39. The washer can contain anywhere from 2 to 100 parts at anytime, depending upon the part size. The typical annual production rate is 5000 parts per year and the average process operating schedule is 16 hours per day, 5 days per week, and 50 weeks per year. This comment affects Conditions A.2(c), D.3 Facility Operation Conditions Description, and page 2 of the Technical Support Document (TSD) Unpermitted Emission Units and Pollution Control Equipment (b).

Response to Comment 2:

For further clarification regarding the maximum capacity of the solvent-based mask washers, the conditions will be changed to include the fact that it is a batch process and can have greatly varying numbers of parts per hour dependent on the size of part and process. In addition, the stack identification numbers will be changed. However, the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, Conditions A.2(c), and D.3 (facility description) will be changed as follows. The TSD will remain unchanged as a result of this comment.

(c) One (1) closed top Solvent-based Mask Washer, identified as emission unit 129 and installed in 1994, with a **batch process** maximum unit capacity **varying from two (2) to one-hundred (100)** ~~of 1.25~~ pieces per hour, exhausting to stacks 3-3~~7~~**8** and 3-3~~8~~**9**.

D.3 One (1) closed top Solvent-based Mask Washer, identified as emission unit 129 and installed in 1994, with a **batch process** maximum unit capacity **varying from two (2) to one-hundred (100)** ~~of 1.25~~ pieces per hour, exhausting to stacks 3-3~~7~~**8** and 3-3~~8~~**9**.

Comment 3: Additional Insignificant Activities:

Grote identified five (5) additional pieces of equipment/processes that they considered to be insignificant activities that have not been addressed in the original Title V application or previous correspondence with IDEM. These processes are listed below:

(a) Ultraviolet Curing Process (Emission Unit 144)

The ultraviolet (UV) curing process (Emission Unit 144) uses a coating with low volatile organic compound (VOC) content of 0.8 pounds per gallon. The coating is cured in the UV Cure Tunnel, which is exhausted through Stack 1-13. The operation ranges from 1 to 2 shifts per day, 5 days per week, and 52 weeks per year. Approximately 80 gallons of this coating was used in 1998, resulting in VOC emissions of 69 pounds. The actual VOC emissions, as well as the potential, are below 15 pounds per day. Also, curing of UV coatings and inks is classified as insignificant per 326 IAC 2-7-1(21)(G)(vi)(HH).

(b) Stamp Pad (Emission Unit 145)

The Stamp Pad process (Emission Unit 145) uses minimal quantities of red and white inks and ink thinner to stamp wording on directional signals. The operation entails 2 shifts per day, 5 days per week, and 52 weeks per year. In 1998, a total of 8.5 gallons of inks and 4 gallons of

thinner were used. The total VOC emissions from the use of these materials were less than 100 pounds per year. The process also uses minimal quantities of isopropyl alcohol for cleanup purposes, which is addressed further below. The actual VOC emissions, as well as the potential, are below 15 pounds per day. In addition, these materials do not contain any hazardous air pollutants (HAPs). Thus, this source is insignificant per 326 IAC 2-7-1(21)(A).

(c) Label Printer (Emission Unit 146)

The label printer (Emission Unit 146) uses minor quantities of inks, cleaners, washes and developers to print the part/item number and UPC code on packages. The operation entails 1 shift per day, 5 days per week, and 52 weeks per year. The annual usage of the various printing materials is less than 25 gallons per year. The annual VOC emission rate is less than 100 pounds per year. The actual VOC emissions, as well as the potential, are below 15 pounds per day. Thus, this source is insignificant per 326 IAC 2-7-1(21)(A).

(d) Adhesive Robots (Emission Units 147 and 148)

The two adhesives robots (Emission Units 147 and 148) use two types of adhesives, depending upon the specific part being produced. The operation entails two shifts per day, 5 days per week, and 52 weeks per year. One adhesive is silicone-based and contains no VOCs. The other adhesive is a two-part isocyanate based material that is used on only one product. The Part A contains a maximum of 5 percent VOC, with no HAPs. The Part B contains a maximum of 50 percent methylene bisphenyl isocyanate (MDI), which is a HAP. The MDI polymerizes upon contact with air and the Part A material; MDI emissions are minimal as a result of the polymerization reaction. In 1998, approximately 3500 pounds and 6500 pounds of Part A and Part B materials, respectively, were used in both processes. The VOC emissions associated with the use of two-part adhesive is estimated at 175 pounds, based upon the compete volatilization of the VOC in the Part A material. The HAP emissions are estimated to be minimal due to the strong polymerization potential of MDI upon contact with the Part A material and air. The actual VOC emissions, as well as the potential, are below 15 pounds per day for each robot. Thus, these sources are insignificant per 326 IAC 2-7-1(21)(A). The actual HAP emissions, a well as the potential, are below 1 ton per year for each robot. Thus, these sources are insignificant per 326 IAC 2-7-1(21)(C)(i).

In further investigations submitted on November 30, 2000, Grote has reviewed the process operations, conducted literature searches regarding polyurethane adhesive process chemistry, contacted the manufacturer of the adhesive, and has performed emissions calculations for air releases of methylene bisphenyl isocyanate (MDI), which is classified as a HAP. The results of the literature search, discussions with the adhesive manufacturer, and potential emission calculations confirm Grote's position that the adhesive robots are insignificant sources pursuant to 326 IAC 2-7-1(21)(C)(i). MDI is considered a "consumable volatile organic compound (VOC) or HAP", meaning chemical agents used in the manufacturing process are chemically altered or bound and are consumed in the manufacturing process. As a result, the volatilization potential, and therefore the emissions of MDI, are minimal. This finding is corroborated by the manufacturer as well as the "MDI Emissions Estimator," software developed by API. This program predicted potential emissions of MDI from both adhesive robots equal to 1.91×10^{-5} lb/yr, well below the significant threshold of 1 ton per year. Therefore, the adhesive robots are insignificant units per 326 IAC 2-7-1(21)(c)(i).

(e) Isopropyl Alcohol Facility-wide Cleanup Operations

Isopropyl alcohol is used for miscellaneous cleanup of equipment throughout the facility. The material composition is 70 percent isopropyl alcohol and 30 percent water. It is principally used in the Mold Area, Plastic Area, and Stamp Pad. The 1998 actual usage was 90 gallons per year which is less than 500 pounds of VOC per year. The usage rates by area were 10 gallons, 40 gallons, and 40 gallons in the Mold Area, Plastic Area, and Stamp Pad, respectively. The actual VOC emissions, as well as the potential, are below 15 pounds per day. Thus, this source is insignificant per 326 IAC 2-7-1(21)(A).

In the comments from November 30, 2000, Grote identified five (5) additional insignificant activities.

(f) Ten natural gas-fired space heaters, water heaters, and make-up air heaters < 10 MMBtu/hr (EU 155, 157 through 159, 161 through 163, 165, 166, and 168): 326 IAC 2-7-1(21)(G)(i)(AA)(aa)
(g) One production welding operation (EU 187): 326 IAC 2-7-1(21)(G)(vi)(EE)(dd)
(h) Miscellaneous laboratory and research and development activities including a laboratory electric oven for curing fiberglass and plastic models (EU 190), laboratory hood (EU 164), and a prototype/modeling paint booth for fiberglass and plastic models (EU 156): 326 IAC 2-7-1(21)(D) and (E)
(i) Two mounted belt sanders (EU 188 and 189): 326 IAC 2-7-1(21)(B)
(j) Nickel electroplating operations (EU 191): 326 IAC 2-7-1(21)(B) and 326 IAC 2-7-1(21)(C)(i)

A discussion of potential emission calculations for additional insignificant emission units that were classified as such due to their emissions levels is detailed below.

(i) Belt Sanding Operations

There are a total of two (2) mounted belt sanders, identified as EU numbers 188 and 189 and exhausting through in-plant filtration, at the facility that are used to sand small areas at the ends of various metal parts. Please note that hand held sanding operations are considered trivial per USEPA White Paper I and also per 326 IAC 2-7-1(40)(F)(x). The PM-10 emissions from the belt sanding operations are below the insignificant activity threshold value of 25 pounds per day in 326 IAC 2-7-1(21)(B). Assuming that the PM-10 emissions are similar to uncontrolled iron foundry metal finishing operations and using the PM emission factor of 0.1 lb/ton in AP-42 Section 12.10, Table 12.10-7, the total weight of metal that has to be processed through each of the belt sanders to exceed the permit exemption threshold is 500,000 pounds per day. The maximum amount of metal processed through these belt sanders is much less than 500,000 pounds per day. HAP emissions from the belt sanding operations will be minimal since any HAP metal component would be present in trace quantities only.

(j) Nickel Electroplating Operations

The nickel electroplating operations are carried out in two tanks each with dimensions of 30 inches wide x 67 inches long x 34 inches deep. These tanks, which are exhausted through in-plant filtration, are used to plate nickel onto metal molds and dies used in plastic molding operations. The maximum current that can be applied is 7 A-hr. Based upon emission factors for nickel electroplating operations from AP-42 Section 12.20, Table 12.20.4 (7/96), the potential PM-10 emissions are 0.015 pounds per day and the potential HAP emissions are 0.07 tons per year for each tank. These emission units are insignificant per 326 IAC 2-7-1(21)(B) and (C)(i).

Response to Comment 3:

(a) The Ultraviolet Curing Process, Emission Unit 144, which was constructed in 1998 is an insignificant unit. This is due to 326 IAC 2-7-1(21)(G)(vi)(HH). There are no regulations that apply to this operation. The potential VOC emissions are less than 25 tons per year and the actual emissions are less than 15 pounds per hour therefore 326 IAC 8-1-6 and 326 IAC 8-2 do not apply. It was constructed after January 1, 1980, therefore 326 IAC 8-6 does not apply. Also, the source is not located in Lake, Porter, Clark, or Floyd County, therefore 326 IAC 8-7 does not apply. Other Article 8 rules do not apply because this operation is not covered in these rules.

(b) The Stamp Pad Process, Emission Unit 145, which was constructed in 1995 is an insignificant unit. This is due to 326 IAC 2-7-1(21)(A). There are no regulations that apply to this operation. The potential VOC emissions are less than 25 tons per year and the actual emissions are less than 15 pounds per hour therefore 326 IAC 8-1-6, 326 IAC 8-2, and 326 IAC 8-5-5 do not apply. It was constructed after January 1, 1980, therefore 326 IAC 8-6 does not apply. Also, the source is not located in Lake, Porter, Clark, or Floyd County, therefore 326 IAC 8-7 does not apply. Other Article 8 rules do not apply because this operation is not covered in these rules.

(c) The Label printer, Emission Unit 146, which was constructed in 1997 is an insignificant unit. This is due to 326 IAC 2-7-1(21)(A). There are no regulations that apply to this operation. The potential VOC emissions are less than 25 tons per year and the actual emissions are less than 15 pounds per hour therefore 326 IAC 8-1-6, 326 IAC 8-2, and 326 IAC 8-5-5 do not apply. It was constructed after January 1, 1980, therefore 326 IAC 8-6 does not apply. Also, the source is not located in Lake, Porter, Clark, or Floyd County, therefore 326 IAC 8-7 does not apply. Other Article 8 rules do not apply because this operation is not covered in these rules.

(d) The two (2) Adhesive Robots, Emission Units 147 and 148, which were constructed in 1993 and 1996 respectively are insignificant units due to 326 IAC 2-7-1(21)(c)(i). The information provided by Grote shows that due to the low vapor pressure of MDI, the reactivity and the lack of volatilization potential, the emissions of MDI are extremely low, well beneath 1 ton per year. This theoretical conclusion is supported by test data from the manufacturer and model results from an API model. As a result, the two (2) Adhesive Robots are considered insignificant. None of the 326 IAC 8 rules apply due to the low VOC potential emissions (see the appendix for detailed calculations).

(e) The Isopropyl Alcohol Usage - Facility wide, Emission Unit 149, which was constructed in 1970 is an insignificant unit. This is due to 326 IAC 2-7-1(21)(A). There are no regulations that apply to this operation. The potential VOC emissions are less than 25 tons per year and the actual emissions are less than 15 pounds per hour therefore 326 IAC 8-1-6, and 326 IAC 8-2 do not apply. It was constructed before October 7, 1974, therefore 326 IAC 8-6 does not apply. Also, the source is not located in Lake, Porter, Clark, or Floyd County, therefore 326 IAC 8-7 does not apply. Other Article 8 rules do not apply because this operation is not covered in these rules.

(f) The ten natural gas-fired space heaters, water heaters, and make-up air heaters < 10 MMBtu/hr (EU 155, 157 through 159, 161 through 163, 165, 166, and 168) are insignificant units based on 326 IAC 2-7-1(21)(G)(I)(AA)(aa). There are no applicable requirements for these units.

(g) The production welding operation (EU 187) is an insignificant unit based on 326 IAC 2-7-1(21)(G)(vi)(EE)(dd). This is a process operation, therefore the provision of 326 IAC 6-3-2(c) applies to this unit.

(h) The miscellaneous laboratory and research and development activities including a laboratory electric oven for curing fiberglass and plastic models (EU 190), laboratory hood (EU 164), and a prototype/modeling paint booth for fiberglass and plastic models (EU 156) are insignificant units based on 326 IAC 2-7-1(21)(D) and (E). There are no applicable requirements for these units.

(i) The two mounted belt sanders (EU 188 and 189) are trivial units because they meet the definition of a trivial activity in 326 IAC 2-7-1(40)(F)(x). Therefore, they are not included in the permit.

(j) The nickel electroplating operations (EU 191) is a trivial unit because it meets the definition of a trivial activity in 326 IAC 2-7-1(40)(A). Emission calculations for this source show that potential to emit of nickel, a HAP, is 0.015 lbs/day. This is below the threshold of 1 lb/day necessary to be considered a trivial activity. If it is assumed that the nickel emissions are equal to PM10 emissions, the unit would emit PM10 in levels that are also significantly below the insignificant threshold. There are no applicable requirements for this unit.

No change will be made to the TSD. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

There are no applicable requirements associated with insignificant activities (a)-(f), (h) and (j). As a result, these activities will not be included in the Title V permit. Insignificant activity (i) is a trivial activity, and therefore, not included in the permit. Insignificant activity (g) does have an applicable requirement. This activity will be included in sections A.3 and D.4 (renumbered D.5). In section D.4 (renumbered D.5), condition D.5.1 will be modified to include the welding processes. Additional structural changes have been made to section A.3 and are described in #2 under section A of Comments made by IDEM. Also, the changes described in Comment 10 are also included. These changes will be made as follows:

Sections A.3 and D.5:

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(c)]

(3) One production welding operation, identified as emission unit 187 [326 IAC 6-3-2(c)].

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2 (c)]

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the Injection Molding Process, PVC Plug Molders, Soldering Stations, Brazing Station, Metal Presses, Abrasive Blasters**, and**

welding operation shall each not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished y the use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

Comment 4: Injection Molding Machines

Table 2 also includes several pieces of equipment whose process operational type has been included in the draft Title V permit. The specific changes in the draft Title V permit wording for the total numbers of equipment and stacks are summarized below.

There are a total of 29 molding machines, Emission Units 57 through 64, 67, 69, 70, 74, 75, 76, 139 through 142 and 169 through 179. All injection molding machines are not exhausted through a stack/vent but rather use in-plant filtration. Also, the total maximum capacity of molded product has increased to 3,450 tons per year.

Response to Comment 4:

Emission units 55 through 77 were addressed in the original Title V Permit, the change in the exhaust point was changed in Comment 1 of the TSD addendum. Units 55, 56, 65, 66, 68, 71, 72, 73, and 77 were removed. Units 139 through 142 and 169 through 179 have been added as new insignificant activities that are exhausting though in-plant filtration. Also, the maximum capacity was increased. However, even though the maximum capacity is larger, the emissions from this unit are still very small, and therefore, this unit is still considered insignificant. This change will be made in sections A.3 and D.4 (facility description) (renumbered D.5). The structure of both these sections have changed and therefore the numbering is different. The condition will be changed and will now read as.

(a)**(1)** One (1) injection Molding Process, consisting of ~~twenty-three (23)~~ **twenty-nine (29)** emissions units, identified as emission units ~~55~~**57** through ~~77~~**64, 67, 69, 70, 74, 75, 76, 139 through 142 and 169 through 179**, the process consists of vertical and horizontal molding using many different thermoplastic and other similar, materials. The process has a total maximum capacity of ~~two-thousand six-hundred and twenty-eight (2628)~~ **three thousand four-hundred and fifty (3450)** tons **of molded product per year**, and ~~exhausting to stack 3-23.~~ **exhausting through in-plant filtration**.

Comment 5: Soldering Stations

As noted in our comments from November 30, 2000, the number of soldering stations operating at the facility has changed. Seven stations have been added (EU 138 and EU 180 through 185). The new total number of soldering stations that are presently operational is 18 (EU 85 through 90, 92 through 95, 98, 138, and 180 through 185). Also, the maximum unit capacity is 300 pieces per hour. The exhaust stacks identification numbers have changed for some of these units as discussed in Response #1 to Grote Comments. The exhaust stacks in order of the respective emission unit are 1-7 (EU 85), 1-9 (EU 86 and 87), 1-58 (EU 88), 2-4 (EU 89), 2-13 (EU 90), in plant filtration (EU 92 through 95), 1-16 (EU 98), 1-13 (EU 138), 1-9 (EU 180) and in-plant filtration (EU 181 through 185). This comment also affects the Facility Description in Section D.4.

Response to comment 5:

The additional soldering stations, will be added in section A.3 and D.4 (facility description) (renumbered D.5). In addition, A.3 will be restructured to be consistent with the description in D.5. A.3(d)(1)-(11) will be condensed into one description A.3(c)(1). Additional structural changes have been made to this section and are described in #2 under section A of Comments made by IDEM. The conditions will be amended as follows:

Section A.3

~~(d) Twelve (12) Soldering Stations consisting of the following emission units [326 IAC 6-3-2(a)]:~~

~~(1) One (1) Solder Station, identified as emission unit 85, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-7.~~

~~(2) One (1) Solder Station, identified as emission unit 86, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-9.~~

~~(3) One (1) Solder Station, identified as emission unit 87, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-9.~~

~~(4) One (1) Solder Station, identified as emission unit 88, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-58.~~

~~(5) One (1) Solder Station, identified as emission unit 89, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-4.~~

~~(6) One (1) Solder Station, identified as emission unit 90, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-13.~~

~~(7) One (1) Solder Station, identified as emission unit 92, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting through in-plant filtration through a fume extractor.~~

~~(8) One (1) Solder Station, identified as emission unit 93, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting through in-plant filtration through a fume extractor.~~

~~(9) One (1) Solder Station, identified as emission units 94, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting through in-plant filtration through a fume extractor.~~

~~(10) One (1) Solder Station - identified as emission unit 95, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting through in-plant filtration through a fume extractor.~~

~~(11) One (1) Solder Station - prototype work cell, identified as emission unit 98, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-16.~~

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment [326 IAC 6-3-2(c)]

(1) Eighteen (18) Soldering Station, identified as emission units 85-90, 92-95, 98, 138, and 180-185, each with a maximum unit capacity of three-hundred (300) pieces per hour, and exhausting to stacks 1-7, 1-9, 1-58, 2-4, 2-13, in plant filtration, 1-16, 1-13, 1-9, and in-plant filtration, respectively.

Section D.5

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment

~~(d)~~**(1)** ~~Eleven (11)~~ **Eighteen (18) Solder Stations**, identified as emission units 85-90, 92-95, ~~and~~ 98, **138, and 180-185**, each with a maximum unit capacity of ~~seventy-five (75)~~ **three-hundred (300)** pieces per hour, an exhausting to stacks ~~1-9, 1-7, 1-6, 1-46, 2-2, 2-1, 2-12, 2-13,2-20, and 1-50,~~ **1-7, 1-9, 1-58, 2-4, 2-13, in plant filtration, 1-16, 1-13, 1-9, and in-plant filtration,** respectively.

Comment 6: Maintenance Abrasive Blasters

There are a total of 2 maintenance abrasive blasters, identified as emission units 143 and 160 that use in-plant filtration. The additional abrasive blaster is Emission Unit 143, which has no stack but rather uses in-plant filtration.

Response to Comment 6:

The additional maintenance abrasive blaster, will be added in section A.3 and D.4 (facility description) (renumbered D.5) and the emission unit numbers will be added for clarity. Additional structural changes have been made to A.3 and as a result the maintenance abrasive blasters have been relabeled as (d). Please see #2 under section A of Comments made by IDEM for further information. The conditions will be amended as follows:

~~(g)~~**(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations:** ~~One (1)~~ **Two (2**) Maintenance Abrasive Blaster**s,**~~with a bag filter.~~ **identified as emission units 143 and 160,** exhausting through in-plant filtration.

Comment 7: Combustion Sources

There are a total of 27 natural gas-fired space heaters and make-up air heaters, Emission Units 99 through 117 and 130 through 137. The additional heaters are Emissions Units 130 through 135, which are exhausted through Stacks 1-RT5, 1-RT6, 1-RT7, 1-RT8, 1-RT9, and 1-RT10, respectively, and Emission Units 136 and 137, which have no stack but rather use in-plant filtration.

Response to Comment 7:

These emission units are insignificant and have no applicable requirements. As a result, they have been deleted from the permit. (See #3 of Section A from "Additional Revision made by IDEM"). Normally, these units would be included in the TSD and not the Title V permit. However, since the permit has already gone through public notice, and OAQ prefers the TSD to reflect the permit that was on public notice, no changes will be made to the TSD. Changes to the permit or technical support material that occur after public notice are documented in this Addendum to the TSD. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 8: Electric Drying Oven

This drying oven is exhausted through Stack 3-26. This information is provided for clarification purposes. This comment affects Condition A.3(h)(1), Condition D.4(h)(1) Facility Description Insignificant Activities, and page 3 of the TSD Insignificant Activities (l)(1).

Response to Comment 8:

These emission units are insignificant and have no applicable requirements. As a result, they have been deleted from the permit. (See #3 of Section A from "Additional Revision made by IDEM"). Normally, these units would be included in the TSD and not the Title V permit. However, since the permit has already gone through public notice, and OAQ prefers the TSD to reflect the permit that was on public notice, no changes will be made to the TSD. Changes to the permit or technical support material that occur after public notice are documented in this Addendum to the TSD. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 9: Metal Painting Process Natural Gas Drying Oven

This drying oven (Emission Unit 123) has propane backup fuel capabilities and is exhausted through Stack 1-54. The maximum heat input capacity is 4.22 MMBtu/hr; there are 2 burners with heat input capacity of 2.11 MMBtu/hr each. The heat input capacity data have been revised; this revision and other similar revisions are discussed further below. This comment affects Condition A.3(h)(2), Condition D.4(h)(2) Facility Description Insignificant Activities, and page 3 of the TSD Insignificant Activities (l)(2).

This drying oven is also currently included under the category on natural gas-fired process heaters in the draft permit. If it is to be listed separately under the drying oven category, then the number of natural gas-fired process heaters should be 5 in Condition A.3(i)(2), Condition D.4(i)(2) Facility Description Insignificant Activities and page 4 of the TSD Insignificant Activities (m)(2). Emission Unit 123 and Stack 1-54 would then be omitted.

Response to Comment 9:

These emission units are insignificant and have no applicable requirements. As a result, they have been deleted from the permit. (See #3 of Section A from "Additional Revision made by IDEM"). Normally, these units would be included in the TSD and not the Title V permit. However, since the permit has already gone through public notice, and OAQ prefers the TSD to reflect the permit that was on public notice, no changes will be made to the TSD. Changes to the permit or technical support material that occur after public notice are documented in this Addendum to the TSD. This accomplishes the desired

result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 10: Metal Presses

Metal Presses are listed on page 11 of the TSD as having allowable particulate matter (PM) emission rates, similar to other sources that are listed in Condition A.3 Specifically Regulated Insignificant Sources and Condition D.4 Facility Description Insignificant Activities. Metal Presses should also be listed in these two sections. Also, metal presses would be listed in Condition D.4.1 Particulate Matter Emission Limitations and Standards.

Also, as noted in our comments dated November 30, 2000, the number of metal presses operating at the facility has changed. Six machines have been permanently shutdown (EU 1 and 11 through 15). The new total number of metal presses that are presently operational is 18 (EU 2 through 10 and 16 through 24). This comment affects Section A.3 and the Facility Description in Section D.4.

Response to Comment 10:

The twenty-four (24) metal presses are currently listed in Condition A.3(a)(3) and in Condition D.4 (renumbered D.5) (facility description)(a)(3). The changes to the emission units will be made in both sections. Metal Presses will also be listed in Condition D.5.1 Particulate Matter 326 IAC 6-3-2(c), as they are in the TSD. In addition, since the emissions from the drying ovens are not considered process emissions, they have been removed from this condition. Also, changes from Comment 3 have also been incorporated. The changes are as follows:

A.3 and D.5

> ~~Twenty-Four (24)~~ **Eighteen (18)** Metal Presses, identified as emission units ~~1~~**2** through ~~24~~**10 and 16 through 24**, exhausting to through in-plant filtration. [326 IAC 6-3-2(c)]

D.~~4~~**5**.1 Particulate Matter (PM [326 IAC 6-3-2 (c)]

> Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the Injection Molding Process, PVC Plug Molders, Soldering Stations, Brazing Station, **Metal Presses**, Abrasive Blasters, and welding operation ~~and Drying Ovens~~ shall each not exceed the pound per hour emission rate established as E in the following formula:
>
> Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished with the use of the equation:
>
> $E = 4.10\ P^{.067}$ Where E = rate of emission in pounds per hour, and
> P = process weight rate in tons per hour

Comment 11: Compliance Monitoring

Condition C.11 requires the installation of any necessary equipment and any required monitoring within 90 days of receipt of the final permit. Grote will now be required to monitor VOC usage rates on a daily basis for each paint booth. In order to meet this requirement, the facility will have to develop methods and databases, as well as purchase equipment, to track the individual booth coating and cleanup solvent usage rates. It is our understanding that the required monitoring system will have to be completed within the required time frame of 90 days. This may affect the first quarterly report since the monitoring

systems and equipment for individual paint booths may not be entirely operational or available until the end of the first quarterly reporting period under the final permit.

Response to Comment 11:

This condition has been re-numbered to C.12. Ninety days is believed to be generally adequate to install any required monitoring equipment that is not already present. Note that this refers only to monitoring equipment, such as pressure drop gauge, not to control equipment. In addition, "monitoring equipment" can also refer to the development of a monitoring system, even when no actual equipment is being installed. The condition also contains a provision that, if due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days by notifying IDEM. There has been no change to this condition.

Comment 12: Paint Booth Particulate Matter Control

In Conditions D.1.5 and D.2.7, the currently wording implies that the dry filters and water wash curtains of all paint booths must be in operation at all times when any one paint booth is operating. Grote proposes that the wording be slightly modified to note that only the dry filters or wash curtain associated with a currently operating paint booth be in operation.

Response to comment 12:

Conditions D.1.5 and D.2.7 will be changed to clarify that only the booth or booths that are in operation need to have the control equipment in operation. Comment #9 in the D section of "Additional Revisions made by IDEM" is also incorporated in Condition D.2.7. Condition D.1.4 and D.2.6 will now be changed to the following.

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the **corresponding booth(s) is/are in operation for the three (3) paint booths** (EU 78, 79, 81) ~~are in operation~~.

D.2.7 Particulate Matter (PM)

(a) **In order to comply with D.2.2,** the water wash curtain for PM control shall be in operation at all times when the **corresponding paint booths** (EU82, and 83) are in operation.

Comment 13: VOC Emissions Demonstration

In Conditions D.1.7 and D.2.6, the permit states that compliance will be based upon total VOC usage. Grote proposes that clarifying text be added to indicate that the amount of VOC shipped out as waste may be subtracted from the VOC input to the booths. The term "usage" may imply only VOC input to a paint booth, and not incorporate the amount that is collected as waste, which is not emitted to the atmosphere.

Response to Comment 13:

Condition D.1.2 and condition D.2.1 both read "The input of VOC to the...coating booths...shall each limited to less than twenty-five (25) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus any solvents shipped out...". Therefore, Conditions D.1.7 and D.2.6 which cite conditions D.1.2 and D.2.1 respectively are referring to the previously mentioned

language. To clarify the term "usage" however, conditions D.1.7 and D.2.6 will now be changed to the following:

D.1.7 Volatile Organic Compound Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage **minus any solvents shipped out** for the most recent twelve (12) consecutive month period.

D.2.6 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage **minus any solvents shipped out** for the most recent twelve (12) consecutive month period.

Comment 14: Paint Booth Record Keeping Requirements

In Conditions D.1.9(a)(1) and D.2.9(a)(1), the permit reads, "Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used." Grote proposes that the word "shall" be changed to "may" since the purchase records and invoices are not representative of actual usage, which will now be monitored daily for each booth. Grote will maintain these daily usage rates for 5 years, as required by the permit.

Response to Comment 14:

MSDSs are necessary to verify the type and amount of VOC content so that can not change. However, purchase orders and invoices can be used as examples of other records that may be necessary. The Conditions for D.1.9 (a)(1) and D.2.9 (a)(1) will now read as:

> The amount and VOC content of each coating material and solvent used shall be recorded. Records shall include ~~purchase orders, invoices, and~~ material safety data sheets (MSDS) **and other records** necessary to verify the type and amount used **that may include purchase orders and invoices**. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

Comment 15: Mask Washer Particulate Matter Emission Standards

Grote believes that there are no applicable PM emission standards for the mask washer as the cleaning solvent does not contain any solids, but rather is 100 percent solvent. The solvent employed is Solvent 2230, which contains 68 percent toluene, 21 percent methyl ethyl ketone, and 9 percent methyl isobutyl ketone, and 0.1 percent benzene, xylene, and ethyl benzene each. These chemicals are all classified as HAPs. This comment affects Condition D.3.1 Particulate Matter Emission Limitations and Standards, the Limited Potential to Emit Table and Table A PSD Applicability on pages 6 and 7 of the TSD, respectively, and page 5 of the Appendix A Emissions Calculations.

Response to Comment 15:

Condition D.3.1 will be removed because there are no applicable PM emission standards for the mask washer while the solvent used contains no solids. Condition D.3.3. (Testing Requirements) will also be removed. All of the following conditions in Section D.3. will be renumbered respectively. The conditions will now be changed to the following:

~~D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2(c), the PM from the Mask Washer shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~The pounds per hour limitation was calculated with the following equation:~~

~~Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:~~

~~$E = 4.10 P^{0.07}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour~~

~~D.3.3 Testing Requirements [326 IAC 2-7-6(1), (6)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter and Cold Cleaner Operations limits specified in Condition D.3.1 and D.3.2., shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Comment 16: Particulate Matter Emission Limitations for Sources of Indirect Heating

In Condition D.4.3, the draft permit currently addresses allowable PM emission rates for indirect heating sources installed after September 21, 1983. Although a majority of the insignificant natural gas-fired space and process heaters were installed after this date, there still remains several that were installed prior to this date. Grote proposes the addition of wording to encompass sources constructed prior to this date. Specifically, references to 326 IAC 6-2-3(d) and (e) should be included. This comment will also affect page 11 of the TSD State Rule Applicability — Insignificant Activities.

Response to Comment 16:

The PM limitations for Sources of Indirect Heating, 326 IAC 6-2 are only applicable to boilers. Therefore, since both boilers in section D.4 (now renumbered D.5) were installed before June 8, 1972, it is unnecessary to add language addressing sources installed after June 8, 1972.

Comment 17: Insignificant Activity Compliance Monitoring Requirements

The condition regarding compliance monitoring requirements for insignificant activities that was included in the pre-public notice draft has been deleted from this version. Grote requests that the condition as shown in the pre-public notice draft be restored to the final Title V permit. This condition stated, “There are no applicable compliance monitoring requirements.”

Response to Comment 17:

The change has been made. The following language has been added to D.5:

Compliance Monitoring Requirements

There are no applicable compliance monitoring requirements.

Comment 18: Insignificant Cold Cleaner Usage Rates

On page 3 of the TSD Insignificant Activities (i), wording for the cold cleaner usage rates could be construed to limit the usage to 145 gallons for all cold cleaners facility-wide. Grote proposes additional wording that clarifies that this level not exceed 145 gallons per year for each cold cleaner. Also, Grote requests that this level be equivalent to the quantity of solvent lost to the air, not the quantity purchased.

The cold cleaners that are employed at Grote are used for this facility maintenance purposes and use solvents that are non-halogenated, petroleum distillates. These cold cleaners are currently serviced by Safety Kleen, who removes the waste solvent and replenishes the solvent reservoir drum. The amount of solvent purchased by Grote does not equate to the amount of solvent air emissions. The waste solvent contains a fairly high solvent percentage. Grote proposes that the term "usage" for the cold cleaners be analogous to that of the paint booths, which allows the amount of waste cleanup solvents to be subtracted from the paint booth coating and thinner usage quantities in determining VOC usage rates. Thus, the "VOC usage" for each cold cleaner would be calculated by subtracting the quantity of solvent shipped off-site for disposal (taking into account the solvent percentage in the waste) from the amount of solvent purchased.

Also, in comments from November 30, 2000, Grote requested that emission unit numbers 150-154 be added for the five cold cleaners for clarity. In addition, the earliest installation date for any of the cold cleaners is 1998.

Response to Comment 18:

There are no applicable recordkeeping or reporting requirements for the cold cleaners. However, it is recommended that Grote keep internal records of its solvent usage. If the usage for any of the cold cleaners is greater than 145 gallons per year, IDEM should be notified immediately.

The cold cleaners were added to the permit in sections A.3 and D.4 (renumbered D.5). In both sections, the word "each" was inserted into the standard language to clarify that the usage limitation applied to each unit individually. In addition, a new condition was added to section D.5 that describes the requirements of 326 IAC 8-3-2(a) as applied to the five degreasers. These requirements had been previously overlooked. 326 IAC 8-3-5 does not apply to these degreasers because they have a remote solvent reservoir. The language added to sections A.3 and D.5 is as follows:

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: five (5) cold cleaner degreasers, identified as emission units 150-154 with remote solvent reservoirs, installed in 1998 or after.

D.5.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the owner or operator of a cold cleaning facility shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operating requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Comment 19: State Rule Applicability - Entire Source

The PSD Minor Source discussion on page 8 of the TSD State Rule Applicability - Entire Source states that the potential to emit of VOC, PM, and PM-10 is less than 250 tons per year. This statement reflects the numbers in the Limited Potential to Emit Table on page 6 of the TSD. Table A (PSD Applicability) on page 7 of the TSD, however, indicates that the potential emissions of these pollutants are either greater than 250 tons per year or there is "no limit". Grote requests that clarification be added that the PSD Minor Source applicability is based upon the facility's limited potential to emit in the table on page 6 of the TSD.

Response to Comment 19:

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, no change will be made to the Technical Support Document as a result of this comment. However, the following condition has been added to Section C of the permit to limit VOC and PM to 250 tons per year. The limited potential to emit VOC for this source is approximately 232 tons per year. Their unlimited potential to emit is considerably greater than 250 tons per year. As a result, this source-wide limit is necessary to ensure that 326 IAC 2-2 (PSD) is not applicable.

C.9 Volatile Organic Compound and Particulate Matter [326 IAC 2-2] [40 CFR 52.21]

The total VOC emissions from the entire source shall be less than 250 tons per year. The total particulate matter emissions from the entire source shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Comment 20: TSD Compliance Requirements

On page 12 of the TSD Compliance Requirements Section, daily inspections discussed under 1(a) should include water wash curtains in addition to the mentioned dry filters. Water wash curtains are employed for PM control from the three metal paint spray booths.

Response to Comment 20:

In the Title V permit the Compliance Monitoring Requirements for the applicable water wash curtains are currently addressed in Condition D.2.8. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. No change was made as a result of this comment.

Comment 21: Revisions to Natural Gas-Fired Space and Process Heaters Tables

Grote submitted revised source descriptions and heat input capacities for the natural gas-fired space and process heaters at the facility. The previous tables were submitted to IDEM in April 1999 as part of the pre-public notice draft review process. The revisions do not affect the insignificant status of these sources and have been included to present the most accurate information.

Response to Comment 21:

The additional heaters that have been added (emission units 130-137) were addressed in Comment seven (7). Although this newly submitted data is always appreciated, since it is not referenced in the Title V permit or the TSD, no changes or revisions are necessary. The only reference made to the heat input capacity of the combustion sources is the description in Section D.4 (renumbered D.5) that refers to them as Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour and Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal or less than six million (6,000,000) Btu per hour. No change was made as a result of this comment.

Comment 22: Revised Paint Booth Potential Emissions Calculations

Grote submitted a revised potential emission calculation spreadsheet for all metal and plastics paint booths at the facility. These revisions have used the IDEM potential emission spreadsheets for format. The revisions were necessary since the paint usage and composition data in the original Title V application are outdated and, in some instances, inaccurate.

Response to Comment 22:

On June 17, 1999 in a phone conversation with Mr. Chris Meyer, Grote Industries' consultant, we discussed Comment 22. Because a limit had previously been taken, there would be no effect on the Title V permit due to the changed potential emission calculations. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, it was decided that no change would be made as a result of this comment.

Comment 23: Metal Painting Process

Grote indicated that the metal painting process (identified as emission units 82, 83, and 84) should not be subject to the miscellaneous metal coating rule (326 IAC 8-2-9), because the units were constructed prior to January 1, 1980. Grote submitted affidavits to the following:

- All 3 units were constructed in 1976.
- No modifications have been made that would increase either the potential or actual emissions above 25 tons VOC per year.

Response to Comment 23:

Based on the affidavit, IDEM concurs that the metal painting process is not subject to 326 IAC 8-2-9. However, rule 326 IAC 8-6 (Organic Solvent Emission Limitations) applies to any source:

(a) Commencing operation between October 7, 1974 and January 1, 1980 with potential emissions of 100 tons VOC per year or greater and

(b) Not otherwise limited by other rules under 326 IAC 8.

To make 326 IAC 8-6 not applicable, the Part 70 permit will limit the potential to emit of all metal painting booths to less than 100 tons VOC per year combined. According to Grote's affidavit, actual VOC emissions have never exceeded 100 tons per year. The quarterly reports for the metal painting booths will be consolidated into one form and the limit will be changed to 100 tons per year to reflect this limit.

The conditions in section A.2.(b) and D.2 will be amended as follows:

(b) One metal painting Process consisting of the following emission units:

(1) One (1) Paint Spray Booth #1, identified as emission unit 82 and installed in ~~1984~~ **1976**, with a maximum unit capacity of two-thousand seven-hundred fifty (2750) pieces per hour, using a water wash curtain as control, and exhausting to stack 1-48.

(2) One (1) Paint Spray Booth #2, identified as emission unit 83 and installed in ~~1984~~ **1976**, with a maximum unit capacity of two-thousand seven-hundred fifty (2750) pieces per hour, using a water wash curtain as control, and exhausting to stack 1-49.

(3) One (1) Paint Spray Booth #3, identified as emission unit 84 and installed in ~~1983~~ **1976**, with a maximum unit capacity of two-thousand seven-hundred fifty (2750) pieces per hour, using both dry filters and a water wash curtain as controls, and exhausting to stack 1-50.

D.2.1 ~~Miscellaneous Metal Coating [326 IAC 8-2-9]~~ **Organic Solvent Emission Limitations [326 IAC 8-6-2(a)]**

The input of VOC to the metal parts paint spray booths, emission units 82-84, installed after **October 7, 1974, and prior** to January 1, 1980, shall be limited to **less than** ~~twenty-five (25)~~ **one-hundred (100)** tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus any VOC solvent shipped out. This usage limit is required to limit the potential to emit of VOC to less than ~~twenty-five~~ **one-hundred** tons per twelve (12) consecutive month period **total for all three (3) booths** ~~from each booth~~. Compliance with this limit makes 326 IAC ~~8-2-9 (Miscellaneous Metal Coatings)~~ **8-6-2 (Organic Solvent Emission Limitations)** not applicable.

Compliance with this limit shall also render 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003
Facility: Metal Surface Coating Process, Emission Units **82-84**
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than ~~25~~**100** tons **total** per 12 consecutive months

~~**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**~~
~~**OFFICE OF AIR QUALITY**~~
~~**COMPLIANCE DATA SECTION**~~

~~Part 70 Quarterly Report~~

~~Source Name: Grote Industries, LLC~~
~~Source Address: 2600 Lanier Drive, Madison, Indiana, 47250~~
~~Mailing Address: PO Box 1550, Madison, Indiana, 47250~~
~~Part 70 Permit No.: T077-7670-00003~~
~~Facility: Metal Surface Coating Process, Emission Unit 83~~
~~Parameter: Volatile Organic Compounds (VOC)~~
~~Limit: Less than 25 tons per 12 consecutive months~~

~~YEAR: _____~~

~~Month~~	~~Column 1~~	~~Column 2~~	~~Column 3~~	~~Column 4~~	~~Column 5~~
	~~Total VOC This Month~~	~~VOC Drummed for Offsite Disposal This Month~~	~~VOC Usage This Month (Column 1 - Column 2)~~	~~Previous 11 Months~~	~~12 Month Total (Column 3 + Column 4)~~
~~1~~					
~~2~~					
~~3~~					

~~**9** No deviation occurred in this quarter.~~

~~**9** Deviation/s occurred in this quarter.~~
~~Deviation has been reported on: _____~~

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address: PO Box 1550, Madison, Indiana, 47250
Part 70 Permit No.: T077-7670-00003
Facility: Metal Surface Coating Process, Emission Unit 84
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 25 tons per 12 consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 5
	Total VOC This Month	VOC Drummed for Offsite Disposal This Month	VOC Usage This Month (Column 1 - Column 2)	Previous 11 Months	12 Month Total (Column 3 + Column 4)
1					
2					
3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

~~Deviation has been reported on: _____~~

~~Submitted by: _____~~
~~Title / Position: _____~~
~~Signature: _____~~
~~Date: _____~~
~~Phone: _____~~

~~Attach a signed certification to complete this report.~~

Comment 24: Minor Typographical Errors

A few minor typographical errors were noted. They are as follows:

(a) In Condition C.2.b, the last line "continuous" is misspelled.
(b) Condition C.19.(b) should read "December 31" instead of "December 30."
(c) Condition D.2.7.(d) should read D.2.7(b).
(d) Condition D.2.8 first paragraph should read "(a)" instead of "(b)."
(e) Condition D.2.9 should read, "To document compliance with Condition D.2.1, the Permitee shall maintain records in accordance with one (1) through eight (8) below. Records maintained for (1) through (7)..." since there are 8 total records and 7 daily records noted in this section.
(f) Condition D.4.4 should read, "If testing is required by IDEM, compliance with the particulate matter limits specified in Condition D.4.1, D.4.2, or D.4.3..." rather than referencing Condition D.3
(g) There is an inadvertent space in the second last line of the second paragraph on page 12 of the TSD.

Response to Comment 24:

The typographical errors were addressed, (a)-(f) were corrected in the permit. Section D.4 has changed to Section D.5, therefore (f) was corrected to reflect this change. However, (g) which was located in the TSD, and is not federally enforceable, will not have the spacing corrected. The comments (a)-(f) will be changed. No change will be made as a result of comment (g).

(a) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a ~~continuos~~ **continuous** opacity monitor) in a six (6) hour period.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December ~~30~~ **31**. The annual emission statement must be submitted to

(c) ~~(d)~~**(b)** The water wash curtain and dry filters for PM control shall be in operation at all times when the one (1) paint booth (EU 84) is in operation.

(d) ~~(b)~~**(a)** Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. Daily inspections shall be performed to insure the liquid flow rate will produce uniform water curtains. To monitor the performance of the dry filters and water wash curtains, weekly observations shall be made of the overspray from the surface coating booth stacks (1-23, 1-24, 1-26) while one

or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C- Compliance Monitoring Plan-Failure to Take Response Steps, shall be considered a violation of this permit.

(e) D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with one (1) through ~~six(6)~~ **nine (9)** below. Records maintained for (1) through ~~(6)~~**(7)** shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in conditions D.2.1; and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage.

(g) If testing is required by IDEM, compliance with the **VOC and** Particulate Matter limits specified in Condition**s** ~~D.3.1 or D.3.2~~ **D.5.1 and D.5.2**.

Comment 25: Other Emission Units/Processes Not Included in the Original Title V Application

Upon further review of processes and raw materials, Grote noted that the cleaner used in the Paint Stripper Tank contains two glycol ethers. The cleaner is Additive G, which contains a maximum of 30 percent triethylene glycol monomethyl ether and 10 percent diethylene glycol monomethyl ether and has a density of 8.84 pounds per gallon. The maximum VOC content is 41%. The tank capacity is 1200 gallons to which 110 gallons of Additive G is mixed. After dilution, the percentage of glycol ethers in the tank contents is approximately 3.7 percent. The typical operating schedule is 8 hours per day, 3 days per week, and 52 weeks per year. The maximum hourly capacity of the tank is 125 racks per hour. The average annual throughput is approximately 156,000 racks per year. The Paint Stripper Tank is identified as emission unit 192 and exhausts to stack 1-43.

In 1998, 550 gallons of Additive G were used and the total glycol ether quantity was 0.97 tons per year. Typically one 55-gallon drum is added every month. The vapor pressure of glycol ethers is very low; the vapor pressure at the typical tank operating temperature of 190EF is 0.25 psia. There is a high probability that the glycol ethers will be primarily retained in the tank solution, which is eventually disposed as hazardous waste during tank cleaning operations. Grote would appreciate any guidance from IDEM relative to the inclusion of this process in the Title V permit.

Response to Comment 25:

The Paint Stripper Tank was constructed in 1974 with potential emissions of 8.87 tons/year of total HAPs and 9.09 tons per year of VOC. Therefore, the unit is significant due to the potential HAPs emissions that are greater than one (1) tons per year of an individual HAP. However, no 326 IAC 8 rules apply due to the date that the Paint Stripper Tank was constructed and the relatively low emissions of VOC (see Appendix B at the end of this addendum for detailed calculations). No change will be made to the TSD as it is to reflect the way the permit appeared on public notice. A new section A.2(e) will be added. A D-section is not provided for the paint stripper tank because there are no specifically applicable requirements.

A.2(e)

~~(d)~~**(e) One (1) Paint Stripper Tank, identified as emission unit 192, constructed in 1974, and exhausting to stack 1-43. This unit does not have specifically applicable requirements.**

Comment 26: New Coating Usage

The coatings and cleanup solvents listed in the original Title V permit application were representative coatings. It is our understanding that other coatings and cleanup solvents may be used, without prior notification to IDEM, provided the VOC emissions do not exceed the allowable emissions stated in the Title V permit.

Response to Comment 26:

The coatings and cleanup solvents listed in the Title V permit are representative coatings that are submitted by the source. From that data IDEM, OAQ determines the sources Potential to Emit using the source's worst case coatings. Therefore, as long as the source stays under all applicable requirements and limits from the Title V permit, it can change coatings without prior notification to IDEM. No change was made as a result of this comment.

Comment 27: Responsible Official

Grote proposes that the Responsible Official be designated by title, rather than by name. Grote requests that the Responsible Official be designated as "Plant Manager". In this manner, the Title V permit would not require modification when a new Plant Manager is hired or appointed.

Response to Comment 27:

This change has been made to section A.1

Responsible Official: ~~James L. Braun~~**Plant Manager**

Comment 28: Plug Molder

Since submittal of our previous comments on the first draft of the Title V permit in May 1999, the number of plug molders operating at the facility has changed. One molder has been permanently shutdown (EU 25). The new total number of plug molders that are presently operational is 29 (EU 26 through 54). This comment also affects the Facility Description in Section D.4.

Response to Comment 28:

These changes have been made to section A.3 and D.4 (renumbered D.5).

(2) ~~Thirty (30)~~**Twenty-nine (29)** PVC Plug Molders, identified as emission units ~~25~~**26**-54, with a maximum unit capacity of four-hundred eighty (480) pieces per hour and exhausting through in-plant filtration. [326 IAC 6-3-2(c)]

Comment 29: Natural Gas Boilers

As noted in our comments dated November 30, 2000, the two boilers (EU 96 and 97) have been permanently shutdown. Grote respectfully requests that the Sections A.3(b) and D.4.2 be deleted. This comment also affects the Facility Description in Section D.4.

Response to Comment 29:

The two natural gas-fired boilers have been removed, and sections A.3 and D.4(re-numbered D.5) have been renumbered accordingly:

~~(b) Two (2) Natural Gas-Fired Boilers [326 IAC 6-2-3(d)]:~~

~~(1) One (1) Natural Gas-Fired Boiler, identified as emission unit 96 and installed in 1962, rated at 4.65 million Btu/hr (4.65 MMBtu/hr) and exhausting to stack 1-4.~~

~~(2) One (1) Natural Gas-Fired Boiler, identified as emission unit 97 and installed in 1962, rated at 4.65 million Btu/hr (4.65 MM Btu/hr) and exhausting to stack 1-5.~~

~~D.4.2 Particulate Matter (PM) [326 IAC 6-2-3 (d)]~~

~~Pursuant to 326 IAC 6-2-3 (d) (Particulate Matter Emission Limitations for Sources of Indirect Heating for units in operation on June 8, 1972), the PM emissions from the two (2) 4.65 million British thermal units per hour (MMBtu/hr) heat input boilers shall each be limited to 0.8 pounds per million British thermal unit (0.8 lb/MMBtu) heat input.~~

Comment 30: Brazing Stations

As noted in our comment from November 30, 2000, the number of brazing stations operating at the facility has changed. One station has been added (EU 186) that exhausts through in-plant filtration. This comment also affects the Facility Description in Section D.4.

Response to Comment 30:

The additional brazing station will be added to sections A.3 and D.4. Additional structural changes have been made to this section and are described in #2 under section A of Comments made by IDEM. The conditions will be amended as follows:

~~(c)~~**(2)** ~~One (1)~~**Two (2)** Brazing Station**s**, identified as emission unit**s** 91 **and 186**, exhausting to stack 2-15 **and through in-plant filtration, respectively**.

Comment 31: Computerized Records

Grote proposes that a provision for maintenance of records in computerized form both onsite and offsite be added. This revision is requested given that process operational and maintenance data collection and retrieval systems are becoming more computer-oriented.

Response to Comment 31:

326 IAC 2-7 does not restrict the media used for record keeping. By not specifically listing alternative media (i.e., computer files), the source is not restricted to a particular media as long as the record keeping requirements are met. The condition remains unchanged.

Additional Revisions made by IDEM:

Upon further review, IDEM has decided to make the following changes:

(See following pages)

1. The expiration has been added to the signature box. The Administration and Development Section will be responsible for typing in the issuance date and the expiration date. The expiration is exactly 5 years after the issuance date. For example, if the permit was issued December 13, 1996, the expiration date would be December 13, 2001.

Operation Permit No.: T000-0000-00000	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: **Expiration Date:**

Section A

1. A.1 (General Information) a rule cite from 326 IAC 2-7 for the definition of a major source was added.

   "County status" has been changed to "source location status" and the section has been revised to more closely follow the rule language. This should help clarify when only portions of the county are non-attainment. Also, changes from comment 27 are incorporated.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] **[326 IAC 2-7-1(22)]**

The Permittee owns and operates a stationary plastic and metal automotive parts manufacturing plant.

Responsible Official:	Plant Manager
Source Address:	2600 Lanier Drive, Madison, Indiana, 47250
Mailing Address:	PO Box 1550, Madison, Indiana, 47250
SIC Code:	3647
County Location:	Jefferson County
~~County Status:~~ **Source Location Status**:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

2. A.2 (Emission Units and Pollution Control Equipment Summary) a new piece of equipment has been added to this section. One (1) Robot Plastic Parts Paint Spray Booth was added as condition A.2(d) in order to incorporate changes from Source Modification No. 077-11312-00003, as amended by Administrative Amendment No. 077-11542. The remaining conditions have been renumbered accordingly.

   (d) One (1) Robot Plastic Paint Spray Booth, identified as emission unit 167, installed in 2000, with a maximum capacity of 600 units per hour, exhausting to stack 3-45 and utilizing dry filters as a control device.

3. A.3 (Specifically Regulated Insignificant Activities) has been restructured. A.3(h) and A.3(i)(1)-(2) were deleted from the permit because they do not have rules associated with them. Paragraph A.3(d)(1)-(12) was condensed into one description to be consistent with the description in the D section (see comment # 5). The cold cleaners were also added to A.3 because they are subject to 326 IAC 8-3-2. The rest of the changes were made to clarify why each unit is considered an insignificant activity. The activities were grouped into categories. In addition, the rule cite for the applicable requirements was added to each activity. The changes to (a)(1), the Injection Molding Process from Comment 4, and changes to (d), the Maintenance Abrasive Blasters from comment 6 and changes to (b), the natural gas-fired boilers from comment 29, and all changes due to comment 1 have been incorporated.

Each of the changes made to section A.3 were also made in section D.4 (renumbered D.5).

(a) The following activities have potential uncontrolled emissions equal to or less than the insignificant thresholds described in 326 IAC 2-7-1(21):

~~(a)~~**(1)** One (1) Injection Molding Process, consisting of twenty-nine (29) emission units, identified as emission units 57 through 64, 67, 69, 70, 74, 75, 76, 139 through 142 and 169 thorugh 179, the process consists of vertical and horizontal molding using many different thermoplastic, and other similar materials. The process has a total maximum capacity of three-thousand four-hundred and fifty (3450) tons per year, and exhausting through in-plant filtration.
[326 IAC 6-3-2(c)]

~~(c)~~**(2) Twenty-nine (29) PVC Plug Molders, identified as emission units 26-54, with a maximum unit capacity of four-hundred eighty (480) pieces per hour and exhausting through in-plant filtration. [326 IAC 6-3-2(c)].**

~~(f)~~**(3) Eighteen (18) Metal Presses, identified as emission units 2 through 10 and 16 through 24, exhausting through in-plant filtration. [326 IAC 6-3-2(c)]**

~~(b) Two (2) Natural Gas-Fired Boilers [326 IAC 6-2-3(d)]:~~

~~(1) One (1) Natural Gas-Fired Boiler, identified as emission unit 96 and installed in 1962, rated at 4.65 million Btu/hr (4.65 MMBtu/hr) and exhausting to stack 1-4.~~

~~(2) One (1) Natural Gas-Fired Boiler, identified as emission unit 97 and installed in 1962, rated at 4.65 million Btu/hr (4.65 MM Btu/hr) and exhausting to stack 1-5.~~

~~(d)~~**(b)** ~~Eleven (11) Soldering Stations consisting of the following emission units:~~ **The following equipment related to manufacturing activities and not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(c)]:**

(1) ~~One (1) Solder Station, identified as emission unit 85, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-7.~~ **Eighteen (18) Soldering Stations, identified as emission units 85-90, 92-95, 98, 138, and 180-185, each with a maximum unit capacity of three-hundred (300) pieces per hour, and exhausting to stacks 1-7, 1-9, 1-58, 2-4, 2-13, in-plant filtration, 1-16, 1-13, 1-9, and in-plant filtration, respectively.**

~~(k)~~(2) ~~One (1) Solder Station, identified as emission unit 86, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-9.~~ **Two (2) Brazing Stations, identified as emission units 91 and 186, exhausting to stack 2-15 and through in-plant filtration, respectively.**

(3) ~~One (1) Solder Station, identified as emission unit 87, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-9.~~ **One production welding operation, identified as emission unit 187.**

~~(4) One (1) Solder Station, identified as emission unit 88, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-58.~~

~~(5) One (1) Solder Station, identified as emission unit 89, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-4.~~

~~(6) One (1) Solder Station, identified as emission unit 90, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-13.~~

~~(7) One (1) Solder Station, identified as emission unit 92, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting through in-plant filtration through a fume extractor.~~

~~(8) One (1) Solder Station, identified as emission unit 93, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting through in-plant filtration through a fume extractor.~~

~~(9) One (1) Solder Station, identified as emission units 94, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting through in-plant filtration through a fume extractor.~~

~~(10) One (1) Solder Station - identified as emission unit 95, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting through in-plant filtration through a fume extractor.~~

~~(11) One (1) Solder Station - prototype work cell, identified as emission unit 98, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-16.~~

~~(g)~~**(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing polishing, abrasive blasting, pneumatic conveying, and woodworking operations:** ~~One (1)~~ **Two (2)** Maintenance Abrasive Blasters **identified as emission units 143 and 160, exhausting through in-plant filtration [326 IAC 6-3-2(c)].**

(d) Degreasing operations that do not exceed 145 gallons per 12 months, except subject to 326 20-6: five (5) cold cleaner degreasers, identified as emission units 150-154 with remote solvent reservoirs, installed in 1998 or after [326 IAC 8-3-2].

~~(h) Two (2) Drying Ovens:~~

~~(1) One (1) Electric Drying Oven utilized by the HMSL Plastic Parts Booth (EU78) exhausting through stack 3-26. [326 IAC 6-3-2(a)]~~

~~(2) One (1) Natural Gas Drying Oven utilized by the Metal Painting Process (EU 82, EU 83, and EU 84)~~

~~(i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour and propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour:~~

~~(1) Twenty-seven (27) natural gas-fired space heaters and make-up air heaters, identified as emission units 99-117, and 130-135, exhausting to stacks 1-12, 1-36, 1-RT1, 1-RT2, 1-RT3, 1-RT4, 2-6, 2-9, 2-21, 2-RT1, 2-RT2, 3-27, 3-28, 3-29, 3-30, 3-MAH1, W-2, W-5, W-RT1, 1-5T5, 1-RT6, 1-RT7, 1-RT8, 1-RT9, 1-RT10 and EU136 and EU137 will be using in-plant filtration respectively, with the capability to use propane fuel as a back-up fuel.~~

~~(2) Five (5) natural gas-fired process heaters for the Small and Big Parts Washers and Paint Stripper Tank, identified as emission units 118-122, exhausting to stacks 1-38, 1-39, 1-42, 1-52, 1-53, with the capability to use propane fuel as a back-up fuel.~~

Section B

1. B.1 (Permit No Defense) has been deleted. All other B conditions have been renumbered as a result of this change.

~~B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]~~

~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~

~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

2. B.2 (renumbered B.1) (Definitions) has been revised.

B.~~2~~**1** Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any~~ **the** applicable definitions found in **the statutes or regulations** (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7**)** shall prevail.

3. B.3 (renumbered B.2) (Permit Term) language has been added to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be 5 years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the ~~effective~~ **original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date**.

4. B.4 (renumbered B.3) (Enforceability) (a) has been removed from the rule cite, because the condition refers to all of 326 IAC 2-7-7. B.4(b) has been deleted and combined with B.4(a).

B.~~4~~**3** Enforceability [326 IAC 2-7-7~~(a)~~]

~~(a)~~ **Unless otherwise stated,** all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM**, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.**

~~(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.~~

5. B.8 (renumbered B.7) (Duty to Supplement and Provide Information) language has been added to clarify what types of documents must be certified by the responsible official. B.8(c) has been revised as follows to clarify the procedures for a claim of confidentiality. All sections have been reworded to match the language in the rule.

B.~~8~~**7** Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] **[326 IAC 2-7-6(6)]**

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. **The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]**

(c) ~~Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the~~ **The** Permittee ~~wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17~~ **may include a claim of confidentiality in accordance with 326 IAC 17**. ~~If requested by IDEM, OAQ, or the U.S. EPA, to~~ **When** furnish**ing** copies of requested records directly to U. S. EPA, ~~then the Permittee must furnish record directly to the U. S. EPA. and if the~~ **the** Permittee ~~is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with~~ **may assert** a claim of confidentiality ~~under~~ **in accordance with** 40 CFR 2, Subpart B.

6. B.9 (renumbered B.8) (Compliance with Permit Conditions) the following language should be added to show that conditions that are not federally enforceable may not constitute a violation of the Clean Air Act. Condition (C) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee compiles with the emergency procedures.

B.~~9~~**8** Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit**, except those specifically designated as not federally enforceable,** constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

7. B.10 (renumbered B.9) (Certification) has been revised since there are currently no certifications that would not be required to be certified by the Responsible Official. Condition (b) has been modified to clarify when a certification is needed.

B.~~10~~**9** Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**[326 IAC 2-7-5(3)(C)]**

(a) **Where specifically designated by this permit or required by an applicable requirement, any** ~~Any~~ application form, report, or compliance certification submitted ~~under this permit~~ shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

8. B.11 (renumbered B.10) (Annual Compliance Certification) paragraph (a) has been revised to clarify that the initial certification is from date of issuance until December 31. Paragraph (c) has been revised so that it matches the language of the rule. Also, (c)(5) has been deleted because OAQ has decided that although it has the authority, it may be cumbersome for the source to list all insignificant activities in the annual compliance certification, so the requirement is being deleted from the permit. The word "appropriate" has been added to B.11(c)(1). There is a non-rule policy document for annual compliance certifications which was intended to clarify the requirements of 326 IAC 2-7-6(5). The revision in B.11(c)(1) was made to help clarify the intent which is covered in the NRPD. As part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data" The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law.

B.~~11~~**10** Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** ~~The~~ certification**s** shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

(c) The annual compliance certification report shall include the following:

(1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;

(4) The methods used for determining **the** compliance **status** of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**

~~(5) Any insignificant activity that has been added without a permit revision; and~~

~~(6)~~**(5)** Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

9. B.12 (renumbered B.11) (Preventive Maintenance Plan) language has been added to clarify that the PMP and the PMP extension request do not need to be certified by the responsible official. "Preventive Maintenance Plans" has been replaced with "PMPs" throughout the condition, since it has already been defined. In B.12(c) language was added that says the source has a

reasonable time to provide a PMP when IDEM, OAQ requests it. Also, recordkeeping requirements have been added to this condition.

B.~~12~~**11** Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP**s**) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond ~~its~~ **the Permittee's** control, the PMP**s** cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ PMPs as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) **A copy of the** PMP's shall be submitted to IDEM, OAQ, upon request **and within a reasonable time,** and shall be subject to review and approval by IDEM, OAQ. **IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

(d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

10. B.13 (renumbered B.12) (Emergency Provisions) A reference to the Emergency Occurrence Report Form has been added to B.13(b)(5). The emergency form is for emergencies only , and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. Paragraph (d) part of the first sentence

has been deleted. Since we know it is a TV source, then we also know the malfunction rule has been superceded by the emergency rule. The rule cite in paragraph (e) has been revised to reflect the correct Article 2 rule citation. In paragraph (f), "compliance" has been changed to "accordance."

B.~~13~~**12** Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** ~~notice~~, either ~~in writing~~ **by mail** or facsimile~~, of the emergency~~ to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4-(c)(9)~~ **2-7-4(c)(10)** be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

11. B.14 (renumbered B.13) (Permit Shield) has been reworded to clarify the intent. Some of the language from B.1 has seen added to it. In B.14(c), some of the language has been removed because it is unnecessary and would be contradictory to our revising operating permits. Construction permit terms are covered in the definition of applicable requirements.

B.~~14~~**13** Permit Shield [326 IAC 2-7-15] **[326 IAC 2-7-20] [326 IAC 2-7-12]**

(a) ~~This condition provides a permit shield as addressed in 326 IAC 2-7-15.~~ **Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. **All previously issued operating permits are superceded by this permit.** ~~Compliance with the~~

~~conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:~~

~~(1) The applicable requirements are included and specifically identified in this permit; or~~

~~(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit,~~ IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC ~~22-7-12(b)~~**(8)2-7-12(b)(7)]**

12. B.16 (renumbered B.15) (Deviations from Permit Requirements and Conditions) IDEM is no longer requiring sources to report deviations in 10 days. Now they will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since we relaxed the 10 day notification to a quarterly report. In addition, paragraph (b)(3) has been revised to be consistent with B.12.

B.~~16~~**15** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation~~ **using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.**

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3)~~**(2)** Failure to implement elements of the Preventive Maintenance Plan unless ~~lack of maintenance~~ such failure has caused or contributed to a deviation.

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

13. B.17 (renumbered B.16) (Permit Modification, Reopening, Revocation and Reissuance, or Termination) language has been added to clarify that a request to re-open or revoke the permit must be certified by the responsible official, since these are decisions/actions that will change the status of the source.

B.~~17~~**16** Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] **The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

14. B.18 (renumbered B.17) (Permit Renewal) language has been added to clarify that an application to renew the permit must be certified by the responsible official. In section B.18 (b)(1)(B), 326 IAC 2-5 has been repealed.

B.~~18~~**17** Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4.

Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). **The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. ~~[326 IAC 2-5-3]~~

15. B.19 (renumbered B.18) (Permit Amendment or Modification) (a) has been revised because OAQ does not want a source to be liable for both a TV permit violation and a rule violation. By changing this language OAQ is merely referencing the requirements and not mandating compliance with it. 326 IAC 2-7-4 (f) requires all applications to be certified by the responsible official, therefore, this condition has been revised to clarify that.

B.~~19~~**18** Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) ~~The Permittee must comply with~~ **Permit amendments and modifications are governed by** the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule~~.

16. Delete B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) and revise B.22(b) (renumbered B.20b) (Operational Flexibility) as follows. Both conditions refer to the same rule and it makes more sense for them to be combined. Paragraph (b)(1) was taken out so the condition would be consistent with the language in the rule. In B.20(a)(2), 326 IAC 2-1 was replaced with 2-7-10.5.

~~B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

~~(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~

~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

B.~~22~~**20** Operational Flexibility [326 IAC 2-7-20]**[326 IAC 2-7-10.5]**

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any **preconstruction** approval required by 326 IAC ~~2-1~~ ~~**2-1.1**~~ **2-7-10.5** has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

17. B.23 (renumbered B.21)(Construction Permit Requirement) the referenced statute has been repealed therefore this condition has been revised. 326 IAC 2 has been added to make the condition more complete. B.22 has also been revised to address the correct rules for construction at a TV source. It was also revised because we do not want a source to be liable for both a TV permit violation and a rule violation.

B.23~~1~~ ~~Construction Permit~~ **Source Modification** Requirement [326 IAC **2-7-10.5**]

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997,~~ **A** modification, construction, or reconstruction ~~shall be approved as required by and in accordance with~~ **is governed by 326 IAC 2 and** 326 IAC 2**-7-10.5**.

18. B.24 (renumbered B.22)(Inspection and Entry) in order to clarify confidentiality B.24 has been revised. OAQ also determined that subpart (1) and (2) of paragraph (e) were unnecessary, therefore they have been deleted. "At reasonable times" has been deleted because neither the rule nor the statute limit IDEM.

B.24~~3~~**2** Inspection and Entry [326 IAC 2-7-6(2)] **[IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such,** the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, ~~at reasonable times,~~ any records that must be kept under the conditions of this permit;

(c) Inspect, ~~at reasonable times,~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, ~~at reasonable times,~~ substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. ~~[326 IAC 2-7-6(6)]~~

~~(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

~~(2) The Permittee IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

19. B.25 (renumbered B.23) (Transfer of Ownership or Operation) 326 IAC 2-1 has been repealed therefore this condition has been modified.

~~B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]~~

~~Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~

~~(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~

~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c) IDEM, OAQ, shall reserve the right to issue a new permit.~~

B.2~~5~~3 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

20. B.26 (renumbered B.24) (Annual Fee Payment) a rule cite has been added to (a) and (b) has been revised.

B.2~~6~~**4** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. **Pursuant 326 IAC 2-7-19(b)**, if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) ~~Failure~~ **Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.

Section C

1. C.2 (Opacity) has been revised as follows to reflect the current rule language.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary ~~Exemptions~~ **Alternative Opacity Limitations**), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%), any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

2. C.4(Incineration) has been revised to say that 326 IAC 9-1-2 is not federally enforceable and to be consistent with wording in other conditions.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **326 IAC 9-1-2 is not federally enforceable**.

3. C.6(Operation of Equipment) has been revised since there may be control devices that are not required to be used to assure compliance with emission limitations.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute, rule or in this permit, ~~All~~ **all** air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

4. C.7 (Stack Height) language has been added to clarify which parts of 326 IAC 1-7 are not federally enforceable.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.**

5. C.8(Asbestos Abatement Projects) paragraph (e) has been revised to more accurately reflect the rule. The rule cite in the title was changed to make it more generalized.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] ~~[40 CFR 61.140]~~**[40 CFR 61, Subpart M]**

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4**,** emission control requirements are ~~mandatory~~ **applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

6. C.9 (renumbered C.10) (Performance Testing) has been revised to specify the locations of applicable procedures and analysis methods for performance testing. C.9 has also been rearranged for clarity. Language has been added to indicate that the test protocol and the notification of the test date do not require certification by the responsible official. In paragraph (c), "within" has been charged to "not later than."

C.~~9~~**10** Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~ **The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

(b) The Permittee shall notify IDEM, OAQ of the actual test date or least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "Responsible official" as defined by 326 IAC 2-7-1(34).

~~(b)~~**(c) Pursuant to 326 IAC 3-6-4(b),** ~~A~~all test reports must be received by IDEM, OAQ ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by the ~~Commissioner~~ **IDEM, OAQ,** if the source submits to IDEM, OAQ, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

7. C.10(Compliance Schedule) this condition was removed from the Title V permit because it is an application requirement, not a permit requirement.

~~C.10 Compliance Schedule [326 IAC 2-7-6(3)]~~

~~The Permittee:~~

~~(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and~~

~~(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and~~

~~(c) Will comply with such applicable requirements that become effective during the term of this permit.~~

8. C.11 (Compliance Requirements) this is a new condition that refers to our general compliance authority in 326 IAC 2-1.1-11.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

9. C.11 (renumbered C.12) (Compliance Monitoring) has been revised to clarify when compliance monitoring must begin, and to clarify that new emission units must begin compliance monitoring upon start-up. Existing units should continue any already required compliance monitoring, but have 90 days to start any compliance monitoring that has been added as result of TV review. In addition, there are times when compliance monitoring is required by a MACT that the source

does not have to comply with yet. Therefore, language has been added to clarify that the permit will specify when compliance monitoring doesn't have to start in 90 days. The same idea applies to new units, if the MACT doesn't apply yet, we would not expect the source to start compliance monitoring.

C.~~11~~**12** Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

~~Compliance with applicable requirements shall be documented as required by this permit~~. **Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by the Section D,** the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment ~~no more than ninety (90) days after receipt of this permit~~. If due to circumstances beyond its control, ~~this schedule cannot be met~~ **that equipment cannot be installed and operated within ninety (90) days**, the Permittee may extend **the** compliance schedule **related to the equipment for** an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

10. C.12 (renumbered C.13) (Maintenance of Monitoring Equipment) the heading and text have been revised to show that this option should be used for any emission monitoring equipment. Some language has also been changed to clarify the intent.

C.~~12~~**13** Maintenance of **Emission** Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the **emission** monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less **often** than ~~one (1)~~ **once an** hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

11. C.13 (renumbered C.14) (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit. In addition, rule cites have been added.

C.~~13~~**14** Monitoring Methods [326 IAC 3]**[40 CFR 60] [40 CFR 63]**

Any monitoring or testing **required by Section D** ~~performed to meet the applicable requirements~~ of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63,** or other approved methods as specified in this permit.

12. C.14 (renumbered C.15) (Emergency Reduction Plans) There was an error in this condition. The ERP does require certification by the responsible official, since most of the time an emergency will mean shut down.

C.~~14~~**15** Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

13. C.15 (renumbered C.16) (Risk Management Plan) (b) was removed because it is repetitive of (a)(2) (now (b)). They both required the same thing, and the source does not need to separately certify RMP compliance. Also, if a source is subject to 40 CFR 68, they should have already submitted a Risk Management Plan. This source has not submitted a Risk Management Plan, therefore (a)(3) was deleted.

C.~~15~~**16** Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present ~~in a process~~ at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall **submit**:

~~(a) Submit:~~

~~(1)~~**(a)** A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

~~(2)~~**(b)** As a part of the **annual** compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

~~(3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.~~

~~(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.~~

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

14. C.16 (Compliance Monitoring Plan - Failure to Take Response Steps) (c)(1) has been revised to clarify the intent. 326 IAC 1-6 has been removed because this condition has no reference to PMPs. Also, a few grammatical changes were made.

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] ~~[326 IAC 1-6]~~

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. **The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the** ~~This~~ compliance monitoring plan ~~is comprised of~~ **are:**

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) **Reasonable** response steps that **may** ~~will~~ be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking **reasonable** ~~such~~ response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, ~~appropriate~~ **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure ~~to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan~~ **to take reasonable response steps may** constitute a violation of the permit. ~~unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~

(c) ~~After investigating the reason for the excursion,~~ **Upon investigation of a compliance monitoring excursion,** the Permittee is excused from taking further response steps for any of the following reasons:

(1) ~~The monitoring equipment malfunctioned, giving a false reading.~~ **A false reading occurs due to the malfunction of the monitoring equipment**. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied ~~or~~;

(3) An automatic measurement was taken when the process was not operating; ~~or~~

(4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and recordkeeping as required by section D, if the permit provides adequate justification and documents such that failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

15. C.17 (renumbered C.18) (Actions Related to Noncompliance Demonstrated by a Stack Test) "corrective actions" has been changed to "response actions" to be consistent with the rest of the permit. Also, other language has been revised as follows.

C.~~17~~**18** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ **response** actions. The Permittee shall submit a description of these ~~corrective~~ **response** actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize **excess** emissions from the affected facility while the ~~corrective~~ **response** actions are being implemented. ~~IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of~~

~~receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

16. C.18 (renumbered C.19) (Emission Statement) language was added to clarify that emission statements should be certified by the responsible official and that regulated pollutants are defined in 326 IAC 2-7-1. Also, "estimated" was added to (a)(1) and (a)(2) to be consistent with the way 326 IAC 2-6 describes emissions.

C.~~18~~**19** Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate **estimated** actual emissions of other regulated pollutants **(as defined by 326 IAC 2-7-1)** from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

17. C.19 (Monitoring Data Availability) has been incorporated into C.16 Compliance Monitoring Plan- Failure to Take Response Steps. The rest of Section C has been renumbered to account for the deletion of C.19.

~~C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]~~

~~(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~

~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~

~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~

~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~

~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~

~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

18. C.20 (General Record Keeping Requirements) has been revised to be more consistent with the rules and to assure sources that they get a “reasonable time” to produce records no matter how or when we ask for them. “Monitoring” was removed so that the condition will seem more generalized to all record keeping, “reports” was added to clarify that the source must keep copies of those as well. (b) and (c) have been removed because they were unnecessary. If IDEM wanted records of those things, IDEM would specify it in D or elsewhere in the permit.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required ~~monitoring~~ data**, reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request of an IDEM, OAQ, representative~~. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

~~(b) Records of required monitoring information shall include, where applicable:~~

~~(1) The date, place, and time of sampling or measurements;~~

~~(2) The dates analyses were performed;~~

~~(3) The company or entity performing the analyses;~~

~~(4) The analytic techniques or methods used;~~

~~(5) The results of such analyses; and~~

~~(6) The operating conditions existing at the time of sampling or measurement.~~

~~(c) Support information shall include, where applicable:~~

~~(1) Copies of all reports required by this permit;~~

~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~

~~(3) All calibration and maintenance records;~~

~~(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

~~(d)~~**(b) Unless otherwise specified in this permit,** all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

19 C.21 (General Reporting Requirements) the Semi-Annual Compliance Monitoring Report is now the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report has been removed, all the information is in B.13. Paragraph (d) has been revised so that it is clear the reports it refers to are the ones required by section D and do require certification by the responsible official. C.21(g) has been revised to clarify that we base quarters and semi-annual reports on calendar year not on when the permit is issued. For example if a source is issued a permit in February, they need to submit their first quarterly report in March.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] **[326 IAC 2-1.1-11]**

(a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit t~~ **T**he source shall submit ~~a~~ **the attached Quarterly Deviation and** Compliance Monitoring Report **or it's equivalent**. Any deviation from ~~the~~ **permit** requirements, ~~and~~ the date(s) of each deviation**, the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report **required in Section D of this permit** shall be submitted within thirty (30) days of the end of the reporting period. **The report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.~~

~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

~~(g)~~(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

~~The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Section D

1. The following language was added at the end of the facility description box in each of the D sections:

   The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

   The language has become standard since this permit was at public notice.

2. The following condition would normally be deleted because the requirements in this condition are covered in new language that has been added to Section C and are therefore unnecessary in Section D. However, at the request of the source this condition as well as D.2.4, D.3.3, and D.4.4 (renumbered D.5.3), will remain in the permit. This condition will also be added to Section D.4 (Condition D.4.5) for consistency:

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and Particulate Matter limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

3. D.1.6 (Volatile Organic Compounds (VOC)) the last sentence has been removed, it is unnecessary since we have C.11 Compliance Requirements.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. ~~IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

4. D.1.7 (Volatile Organic Compounds Emissions) “most recent” has been taken out for clarity.

D.1.7 Volatile Organic Compounds Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage minus any solvents shipped out for the ~~most recent~~ twelve (12) consecutive month period.

5. D.1.10 (Reporting Requirements) paragraph (b) was moved to section D.1.9 (a)(9). The last sentence of paragraph (c) was added to the end of the first paragraph. These reports should be certified by the responsible official. Part 70 requires all reports to be certified. EPA has also requested this change.

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditiion D.1.2, the permittee shall maintain records in accordance with one (1) through ~~eight (8)~~ **nine (9)** below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2, and to document the quantity of any VOC shipped offsite and deducted form total reported VOC usage.

(9) Records used to determine VOC use shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and any additional information necessary to determine the VOC content, and the date of use. The laboratory analysis of the representative VOC content and the quantity of the solvent collected and drummed for disposal offsite shall be used to determine the VOC shipped offsite, if the solvent VOC content is deducted from the monthly VOC usage reported.

D.1.10 Reporting Requirements

~~(a)~~ A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

~~(b) Records used to determine VOC use shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and any additional information necessary to determine the VOC content, and the date of use. The laboratory analysis of the representative VOC content and the quantity of the solvent collected and drummed for disposal offsite shall be used to determine the VOC shipped offsite, if the solvent VOC content is deducted from the monthly VOC usage reported.~~

~~(c) A material safety data sheet (MSDS) and any additional information necessary to determine the VOC content for each coating and solvent shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC usage.~~ The VOC content of the solvent collected and drummed for disposal offsite shall be reported in each quarterly report if the solvent VOC content is deducted from the monthly VOC usage report. **The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

The above change was also made in Section D.2 to the following pair of Conditions: D.2.9 and D.2.10.

6. D.2.2 (Particulate Matter [PM]) the reference to operating permit OP 39-06-90-0064 has been removed. All operating permits are superceded by the Title V permit, therefore the operating permit becomes obsolete and should not be referenced in the Title V permit.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) ~~and OP 39-06-90-0064, issued on October 29, 1986~~, the PM from each of the three paint booths (82, 83, 84) shall not exceed the pound per hour emission rate established as E in the following formula:

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

The water wash curtain (EU 82, 83, and 84) and dry filters (EU 84) shall be in operation at all times the surface coating booth is in operation, in order to comply with this limit.

7. D.2.5 (Volatile Organic Compounds (VOC)) the last sentence has been removed, it is unnecessary since we have C.11 Compliance Requirements.

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. ~~IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

8. D.2.6 (VOC Emissions) "most recent" has been taken out for clarity when using the day option. This condition should only be used with usage limits and not when there is an 8-2-9 limit.

D.2.6 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage minus any solvent shipped out for the ~~most recent~~ twelve (12) month period. Comment #12 is also incorporated in this condition.

9. D.2.7 (Particulate Matter [PM]) language has been added to clarify with which condition the control equipment is needed to show compliance. Comment #12 is also incorporated in this condition.

D.2.7 Particulate Matter (PM)

(a) **In order to comply with D.2.2,** ~~T~~**t**he water wash curtain for PM control shall be in operation at all times when the corresponding paint booths (EU 82, and 83) are in operation.

(b) **In order to comply with D.2.2,** ~~T~~**t**he water wash curtain and dry filters for PM control shall be in operation at all times when the one (1) paint booth (EU 84) is in operation.

10. D.3 (Facility Description) the first item, one (1) Mask Washer, was deleted. There was not a unique piece of equipment associated with this description and therefore the description was removed.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
~~One (1) Mask Washer~~
One (1) Closed Top Solvent-based Mask Washer, identified as emission unit 129 and installed in 1994, with a batch process maximum unit capacity varying from two (2) to one-hundred (100) pieces per hour, exhausting to stacks 3-37 and 3-38.

11. D.3.2 (renumbered D.3.1) (Cold Cleaner Operations) the applicability date for the cold cleaners has been added for clarification.

D.3.~~2~~**1** Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) **for cold cleaning operations constructed after January 1, 1980,** the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

12. D.3 - The Closed Top Solvent-based Mask Washer is also subject to 326 IAC 8-3-5. Requirements for this rule were added in Condition D.3.2.

D.3.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

13. A new Section D has been added to the Title V permit. Section D.4 for the Robot Spray Booth has been added to incorporate the changes from Source Modification No. 077-11312-00003 as amended by Administrative Amendment No. 077-11542. Section D.4 (Insignificant Activities) has been renumbered Section D.5.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) Robot Plastic Parts Paint Spray Booth, identified as emission unit 167, installed in 2000, with a maximum capacity of 600 units per hour, exhausting to stack 3-45 and utilizing dry filters as a control device.

(This information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Maximum Achievable Control Technology [326 IAC 2-4.1-1]

Hazardous Air Pollutants (HAPs) shall be limited to less than ten (10) tons per twelve (12) consecutive months for a single HAP and less than twenty-five (25) tons per twelve (12) consecutive months for any combination of HAPs. Compliance with this limit shall render 326 IAC 2-4.1-1 (Maximum Achievable Control Technology) and 40 CFR 63.43 (Maximum Achievable Control Technology) not applicable.

D.4.2 Best Available Control Technology [326 IAC 8-1-6]

The input of VOC to the plastic parts surface coating booth, shall be limited to less than twenty-five(25) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus any VOC solvent shipped out. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from each booth. Compliance with this limit shall render 326 8-1-6 (Best Available Control Technology) not applicable. Compliance with this VOC

limit will also render 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.

D.4.3 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from the plastic parts surface coating booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P_{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the surface coating booths are in operation, in order to comply with this limit.

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and Particulate Matter limit specified in Condition D.4.1, D.4.2, and D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.6 HAP Emissions

Compliance with Condition D.4.1 shall be demonstrated at the end of each month based on the total HAP usage minus any solvents shipped out for the most recent twelve (12) consecutive month period.

D.4.7 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.4.8 VOC Emissions

Compliance with Condition D.4.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage minus any solvents shipped out for the most recent twelve (12) consecutive month period.

D.4.9 Particulate Matter (PM)

In order to comply with D.4.3, the dry filters for PM control shall be in operation at all times when the one (1) Robot Spray paint booth is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (3-45) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C- Compliance Monitoring Plan-Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventative measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.11 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records including the amount and HAP content of each coating material and solvent used shall be recorded. Records shall include material safety data sheets (MSDS) and other records necessary to verify the type and amount used that may include purchase orders and invoices. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents, a log of the dates of use, and the total HAP usage for the month. Records used to determine VOC and HAP use shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and any additional information necessary to determine the VOC and HAP content, and the date of use. The laboratory analysis of the representative VOC content and the quantity of the solvent collected and drummed for disposal offsite shall be used to determine the VOC shipped offsite, if the solvent VOC content is deducted from the monthly VOC usage reported.

(b) To document compliance with Condition D.4.2, the Permittee shall maintain records in accordance with one (1) through eight (8) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.2; and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage.

(1) The amount and VOC content of each coating material and solvent used shall be recorded. Records shall include material safety data sheets (MSDS) and other records necessary to verify the type and amount used

that may include purchase orders and invoices. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The quantity of cleanup solvent shipped out each month. Non-VOC waste shall not be commingled with VOC containing waste, if the VOC content of waste shipped offsite is deducted from the reported monthly VOC usage.

(3) A log of the dates of use;

(4) The volume weighted VOC content of the coatings used for each month;

(5) The cleanup solvent usage for each month;

(6) The total VOC usage for each month, and;

(7) The weight of VOCs emitted for each compliance period.

(8) The results of the laboratory analysis of the VOC content of the solvent collected and drummed for disposal offsite. A representative sample of the VOC solvent to be shipped offsite shall be analyzed each quarter if the solvent VOC content is deducted from the monthly VOC usage reported. After one year from the issuance date of this permit the source may request to have the frequency of analysis changed. Volatile Organic Compound (VOC) is defined in 326 IAC 1-2-90.

(c) To document compliance with condition D.4.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.4.1 and D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC content of the solvent collected and drummed for disposal offsite shall be reported in each quarterly report if the solvent VOC content is deducted from the monthly VOC usage report. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.~~6~~5 FACILITY OPERATION CONDITIONS

Forms

3. Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the

Compliance Branch, not the Compliance Data Section. IDEM has negotiated with EPA on the reporting of emergencies. They agree to allow the 2 day notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official, therefore will comply with the Part 70 requirement to have all reports certified.

4. The quarterly reports will now need to be certified by the responsible official, therefore the last line in each of these reports have been changed from ~~"A certification is not required for this report."~~ to "**Attach a signed certification to complete this report".**

5. The Quarterly Compliance Monitoring Report, is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. IDEM is no longer requiring sources to report deviations in ten days, therefore every source will need submit this report quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE ~~DATA SECTION~~ BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

(include local agency when applicable)

PART 70 OPERATING PERMIT
EMERGENCY~~/DEVIATION~~ OCCURRENCE REPORT

Source Name:
Source Address:
Mailing Address:
Part 70 Permit No.:

This form consists of 2 pages **Page 1 of 2**

~~Check either No. 1 or No.2~~
9 ~~1.~~ This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice ~~in writing~~ by mail or ~~by~~ facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
~~9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)~~ ~~C The Permittee must submit notice in writing within ten (**10**) calendar days~~

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency~~/Deviation~~:
Describe the cause of the Emergency~~/Deviation~~:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency~~/Deviation~~ started:
Date/Time Emergency~~/Deviation~~ was corrected:
Was the facility being properly operated at the time of the emergency/~~deviation~~? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency~~/deviation~~:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
(include local agency when applicable)

PART 70 OPERATING PERMIT QUARTERLY ~~(or SEMI-ANNUAL)~~ DEVIATION and COMPLIANCE MONITORING REPORT

Source Name:
Source Address: ***(THIS FORM IS MANDATORY)***
Mailing Address:
Part 70 Permit No.:

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the ~~compliance monitoring~~ requirements stated in this permit. This report shall be submitted quarterly ***~~(or semi-annually)~~*** based on a calendar year. Any deviation from the ~~compliance monitoring~~ requirements, ~~and~~ the date(s) of each deviation, **the probable cause of the deviation, and the response steps taken** must be reported. ~~with the following exceptions:~~ **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.** Additional pages may be attached if necessary. ~~This form can be supplemented by attaching the Emergency/Deviation Occurrence Report.~~ If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	

Response Steps Taken:

Page 2 of 2

~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
~~Compliance Monitoring~~ Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Grote Industries
Address City IN Zip: 2600 Lanier Drive
Plt ID: 077-11313-0003
Reviewer: Lynn Nieman
Date: 10-15-1999

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (Gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
36000195	7.7	69.92%	0.0%	69.9%	0.0%	30.01%	0.01000	240.000	5.35	5.35	12.84	308.10	56.23	12.09	17.77	50%
36000240	7.8	68.93%	0.0%	68.9%	0.0%	31.10%	0.00220	240.000	5.39	5.39	2.85	68.30	12.46	2.81	17.33	50%
36000124	9.0	60.94%	0.0%	60.9%	0.0%	39.10%	0.01000	120.000	5.47	5.47	6.56	157.43	28.73	9.21	13.98	50%
36000282	9.6	48.21%	0.0%	48.2%	0.0%	51.79%	0.00220	600.000	4.62	4.62	6.10	146.47	26.73	14.36	8.93	50%
36000265	8.1	54.80%	0.0%	54.8%	0.0%	45.20%	0.00330	480.000	4.44	4.44	7.03	168.75	30.80	12.70	9.82	50%
36000257	8.5	71.90%	0.0%	71.9%	0.0%	28.10%	0.00360	600.000	6.13	6.13	13.25	317.94	58.02	11.34	21.83	50%
36000281	7.3	83.96%	0.0%	84.0%	0.0%	16.00%	0.01000	120.000	6.10	6.10	7.32	175.79	32.08	3.06	38.15	50%
36000277	7.7	75.08%	0.0%	75.1%	0.0%	24.90%	0.01000	120.000	5.80	5.80	6.96	167.15	30.50	5.06	23.31	50%
361SL	9.4	61.93%	54.9%	7.0%	0.0%	38.07%	0.01000	120.000	0.66	0.66	0.79	18.92	3.45	9.37	1.73	50%
206LE1780	8.5	51.92%	0.0%	51.9%	0.0%	48.10%	0.00440	120.000	4.42	4.42	2.33	55.99	10.22	4.73	9.19	50%
Cleanup Solvent	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	0.00010	600.000	7.22	7.22	0.43	10.40	1.90	0.00		50%
State Potential Emissions			**Add worst case coating to all solvents**								**13.68**	**328.34**	**59.92**	**14.36**	ER	

METHODOLOGY

Pounds of VOC per Gallon Coating Less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Pounds per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/day) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hr/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lb/gal) * Weight % Organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix B: Emissions Calculations
VOC and Particulate
From Adhesive Robots

Company Name: Grote Industries, LLC
Address City IN Zip: 2600 Lanier Drive, Madison, IN 47250
Plt ID: T077-0003
Reviewer: ERG/JC
Date: 06-22-1999

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (Gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
UR-4509-B	9.5	0.00%	0.0%	0.0%	0.0%	100.00%	0.11000	4.170	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
UR-4509A	9.2	3.39%	0.0%	3.4%	0.0%	100.00%	0.11000	4.170	0.31	0.31	0.14	3.43	0.63	0.00	0.31	100%

State Potential Emissions **Add worst case coating to all solvents** **0.14** **3.43** **0.63** **0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating Less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Pounds per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/day) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hr/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lb/gal) * Weight % Organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix B: Emission Calculations
HAP Emission Calculations

Company Name: Grote Industries, LLC
Address City IN Zip: 2600 Lanier Drive, Madison, IN 47250
Plt ID: T077-0003
Reviewer: ERG/JC
Date: 06-17-1999

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MDI	MDI Emissions (ton/yr)
UR-4509-B	9.5	0.110000%	4.17	50.00%	9.54%
UR-4509A	9.2	0.110000%	4.17	0.00%	0.0%

Total State Potential Emissions 9.54 tons/year

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hr/yr * 1 ton/2000 lbs

Appendix B: Emission Calculations
Potential HAPS and VOC
From the Paint Stripper Tank

Company Name: Grote Industries, LLC
Address City IN Zip: 2600 Lanier Drive, Madison, IN 47250
CP: 077-7670
Plt ID: T077-0003
Reviewer: ERG/JC
Date: 06-17-1999

Usage = 55 gallons per month
Density = 8.84 lb/gallon
% Triethylene Glycol Monomethyl Ether = 30%
% Diethylene Glycol Monomethyl Ether = 10%
% VOC = 41%

Tons per year of Triethylene Glycol Monomethyl Ether =

55 gal/month * 8.84 lb/gal * 1 month/4 weeks * 1 week/3 days * 1 day/8 hours = 5.06 lb/hour
5.06 lb/hour * 30% = 1.51 lb/hour
1.51 lb/hour * 8760 hours/yr * 1 ton/2000 lb = 6.65 tons/year

Tons per year of Diethylene Glycol Monomethyl Ether =

55 gal/month * 8.84 lb/gal * 1 month/4 weeks * 1 week/3 days * 1 day/8 hours = 5.06/hour
5.06 lb/hour * 10% = 0.51 lb/hour
0.51 lb/hour * 8760 hours/yr * ton/2000 lb = 2.22 tons/year

Total HAPs = 8.87 tons/year

Tons per year of VOC =
55 gal/month * 8.84 lb/gal * 1 month/4 weeks * 1 week/3 days * 1 day/8 hours = 5.06/hour
5.06 lb/hr * 41% * 8760 hours/yr * ton/2000 lb = 9.09 tons/yr

Indiana Department of Environmental Management
and Enhanced New Source Review
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Grote Industries, Inc.
Source Location:	2600 Lanier Drive, Madison, Indiana, 47250
County:	Jefferson County
SIC Code:	3647
Operation Permit No.:	T077-7670-00003
Permit Reviewer:	ERG/JC

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Grote Industries, Inc. relating to the operation of plastic and metal automotive parts manufacturing.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One Metal Painting Process consisting of the following emission units:

(1) One (1) Paint Spray Booth #1, identified as emission unit 82 and installed in 1984, with a maximum unit capacity of two-thousand seven-hundred fifty (2,750) pieces per hour, using a water wash curtain as control, and exhausting to stack 1-23.

(2) One (1) Paint Spray Booth #2, identified as emission unit 83 and installed in 1984, with a maximum unit capacity of two-thousand seven-hundred fifty (2,750) pieces per hour, using a water wash curtain as control, and exhausting to stack 1-24.

(3) One (1) Paint Spray Booth #3, identified as emission unit 84 and installed in 1983, with a maximum unit capacity of two-thousand seven-hundred fifty (2,750) pieces per hour, using both dry filters and a water wash curtain as controls, and exhausting to stack 1-26.

Unpermitted Emission Units and Pollution Control Equipment

(a) One Plastic Painting Process consisting of the following emission units:

(1) One (1) Spray HMSL & Plastic Parts Booth, identified as emission unit 78 and installed in 1983, with a maximum unit capacity of one-thousand two-hundred (1,200) pieces per hour, using dry filters as control, and exhausting to stack 3-12.

(2) One (1) Hand Spray Plastic Parts Booth, identified as emission unit 79 and installed in 1989, with a maximum unit capacity of two-hundred fifty (250) pieces per hour, using dry filters as control, and exhausting to stack 3-11.

(3) One (1) Upspray Machine Plastic Parts Booth, identified as emission unit 81 and installed in 1986, with a maximum unit capacity of three hundred (300) pieces per hour, using dry filters as control, and exhausting to stack 3-16.

(b) One (1) closed top Solvent-based Mask Washer, identified as emission unit 129 and installed in 1994, with a maximum unit capacity of1.25 pieces per hour, exhausting to stacks 3-37 and 3-38.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) Injection Molding Process, consisting of twenty-three (23) emission units, identified as emission units 55 through 77, the process consists of vertical and horizontal molding using many different thermoplastic and other similar materials. The process has a total maximum capacity of two-thousand six-hundred and twenty-eight (2628) tons per year, and exhausts to stack 3-23.

(b) Two (2) Natural Gas-Fired Boilers:

(1) One (1) Natural Gas-Fired Boiler, identified as emission unit 96 and installed in 1962, rated at 4.65 MMBtu/hr and exhausting to stack 1-10. This boiler has the capability to utilize propane fuel as a backup fuel.

(2) One (1) Natural Gas-Fired Boiler, identified as emission unit 97 and installed in 1962, rated at 4.65 MMBtu/hr and exhausting to stack 1-11. This boiler has the capability to utilize propane fuel as a backup fuel.

(c) Thirty (30) PVC Plug Molders, identified as emission units 25-54, with a maximum unit capacity of four-hundred eighty (480) pieces per hour and exhausting to stack 2-20.

(d) Eleven (11) Soldering Stations consisting of the following emission units:

(1) One (1) Solder Station, identified as emission unit 85, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-9.

(2) One (1) Solder Station, identified as emission unit 86, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-7.

(3) One (1) Solder Station, identified as emission unit 87, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-6.

(4) One (1) Solder Station, identified as emission unit 88, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-46.

(5) One (1) Solder Station, identified as emission unit 89, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-2.

(6) One (1) Solder Station, identified as emission unit 90, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-1.

(7) One (1) Solder Station, identified as emission unit 92, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-12.

(8) One (1) Solder Station, identified as emission unit 93, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-13.

(9) One (1) Solder Station, identified as emission units 94, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-20.

(10) One (1) Solder Station - identified as emission unit 95, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 2-20.

(1) One (1) Solder Station - prototype work cell, identified as emission unit 98, with a maximum unit capacity of seventy-five (75) pieces per hour and exhausting to stack 1-50.

(e) One (1) Brazing Station, identified as emission unit 91, exhausting to stack 2-8.

(f) Twenty-four (24) Metal Presses, identified as emission units 1 through 24, exhausting to stack 2-20.

(g) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(h) One (1) Laboratory with research and development activities.

(i) Six (6) Cold Cleaner closed top Petroleum distillate based degreasing operations that do not exceed 145 gallons per 12 months.

(j) One (1) Maintenance Abrasive Blaster with a bag filter.

(k) Paved and unpaved roads and parking lots with public access.

(l) Two (2) Drying Ovens:

(1) One (1) Electric Drying Oven utilized by the HMSL Plastic Parts Booth (EU78).

(2) One (1) Natural Gas Drying Oven utilized by the Metal Painting Process (EU82, EU83, and EU84).

(m) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour and Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(1) Twenty (20) natural gas-fired space heaters and make-up air heaters, identified as emission units 99-117, exhausting to stacks 1-12, 1-36, 1-RT1, 1-RT2, 1-RT3, 1-RT4, 2-6, 2-9, 2-21, 2-RT1, 2-RT2, 3-27, 3-28, 3-29, 3-30, 3-MAH1, W-2, W-5, W-RT1 respectively, with the capability to use propane fuel as a back-up fuel.

(2) Six (6) natural gas-fired process heaters for the Small and Big Parts Washers and Paint Stripper Tank, identified as emission units 118-123, exhausting to stacks 1-38, 1-39, 1-42, 1-52, 1-53, 1-54, with the capability to use propane fuel as a back-up fuel.

(n) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(1) Four (4) Resistance Spot welding units, identified as emission units 124-127.

(2) One (1) Heliarc Stainless Steel Welder, identified as emission unit 128, exhausting to stack 1-31.

Existing Approvals

The source has been operating under a previous approval including, but not limited to, the following :

(1) OP 39-06-90-0064, issued on October 29, 1986.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

(a) IDEM is aware that the equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on February 13, 1997. Additional information was received on July 28, 1998.

A notice of completeness letter was mailed to the source on March 14, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A pages 1 through 5).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	1000.28
PM-10	1000.28
SO_2	0.02
VOC	1940.57
CO	0.72
NO_x	3.42

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Acrylonitrile	Less than 1
Chromium	Less than 1
Ethyl Benzene	Less than 1
Formaldehyde	3.42
Glycol Ether	Less than 1
Methanol	Less than 1
Methylene Chloride	Less than 1
Methyl Ethyl Ketone	9.09
Methyl Isobutyl Ketone	3.03
Methyl Methacrylate	1.127
Styrene	2.03
Triethylamine	Less than 1
Toluene	19.62
Vinyl Chloride	3.24
Xylene	35.951
TOTAL	84.51

(a) The potential emissions (as defined in 326 IAC 1-2-55) of VOCs and PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(o) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM-10	49.37
SO_2	-
VOC	71.51
CO	-
HAP (total)	16.46
NO_x	-

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Metal Paint Spray Booth #1, Emission Unit # 82 (1984)*	41.05	41.05	0	Less than 25	0	0	Greater than 25
Metal Paint Spray Booth #2, Emission Unit # 83 (1984)*	41.05	41.05	0	Less than 25	0	0	Greater than 25
Metal Paint Spray Booth #3, Emission Unit # 84 (1983)*	9.23	9.23	0	Less than 25	0	0	Greater than 25
Plastic Spray HSML Booth, Emission Unit # 78 (1983)*	4.40	4.40	0	Less than 25	0	0	Less than 25
Plastic Hand Spray Booth, Emission Unit # 79 (1989)*	1.06	1.06	0	Less than 25	0	0	Less than 25
Plastic Upspray Machine, Emission Unit # 81 (1986)*	2.99	2.99	0	Less than 25	0	0	Less than 25
Mask Washer , Emission Unit #129 (1994)	20.4	20.4	0	22.57	0	0	Less than 25
Total Emissions	Less than 250	Less than 250	0	Less than 250	0	0	Greater than 25

* PM and PM-10 Limited Potential to Emit calculations are after controls, assuming 90% efficiency of the water wash curtain and dry filters.

Attached Table A summarizes the permit conditions and requirements

	PSD Applicability						
Emission Unit Number	Process	Year Built	VOC Potential (tons/year)	VOC Limit (tons/year)	PM Potential (tons/year)	PM Limit/ PM10 Limit (tons/year)	Reason for limit
78	Plastic Surface coating	1983	99	24	10.99	No Limit	326 IAC 8-1-6
84	Metal Surface Coating	1983	157.99	24	23.09	No Limit	326 IAC 8-2-9 and IAC 2-2
82	Metal Surface coating	1984	700	24	102.62	No Limit	326 IAC 8-2-9 and IAC 2-2
83	Metal Surface coating	1984	700	24	102.62	No Limit	326 IAC 8-2-9 and IAC 2-2
81	Plastic Surface coating	1986	26	24	2.99	No Limit	326 IAC 8-1-6 & 326 IAC 2-2
79	Plastic Surface coating	1989	80	24	2.65	No Limit	326 IAC 8-1-6 & 326 IAC 2-2
129	Mask Washer	1994	22.57	No Limit	20.4	No Limit	--

County Attainment Status

The source is located in Jefferson County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Jefferson County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR Part 63) applicable to this source. The two (2) natural gas fired boilers are not subject to 40 CFR 60, Subpart Dc because the capacities of each are less than ten (10) million Btu and they were constructed in 1962.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR Part 63) applicable to this source. The Solvent-based Mask Washer is not subject to 40 CFR 60, Subpart T since Halogenated Solvents are not utilized in the Washer.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD Minor Source)

The total source Potential to Emit of VOC, PM, and PM-10 are less than 250 tons per year. Therefore the reporting requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and PM. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%), any one (1) six (6) minute averaging period as determined by 326 IAC 5-1-4,

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability- Individual Facilities

Metal Painting Process

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from spray each of the spray booths #1, #2, and #3 (Emission Units 82, 83, and 84) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The water wash curtain (EU 82, 83, and84) and dry filters (EU 84) shall be in operation at all times the surface coating booths are in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The input of VOC to the metal parts surface coating booths (EU 82, 83, and 84), installed after January 1, 1980, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus any VOC solvent shipped out. This usage limit is required to limit the potential to emit of VOC to less

than twenty-five (25) tons per twelve (12) consecutive month period from each booth. Compliance with this limit shall render 326 IAC 8-2-9 (Miscellaneous Metal Coating), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.

State Rule Applicability - Individual Facilities
Plastic Painting Process

326 IAC 8-1-6 Best Available Control Technology (BACT)

The input of VOC to the plastic parts surface coating booths (EU78, EU79, and EU81), installed after January 1, 1980, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus any VOC solvent shipped out. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period from each booth. Compliance with this limit shall render 326 8-1-6 (Best Available Control Technology), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from each of the plastic parts surface coating booths (Emission units 78, 79, and 81) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the surface coating booths are in operation, in order to comply with this limit.

State Rule Applicability - Individual Facilities
Mask Washer

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2, the owner or operator of a cold cleaning facility shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operating requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

State Rule Applicability - Insignificant Activities

Injection Molding Process

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from each of the twenty-three (23) injection molding emission units (Emission units 55 through 77) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Natural Gas Boilers

326 IAC 6-2-3(d) (Indirect Heating)

Pursuant to 326 IAC 6-2-3 (d) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 4.65 million British thermal units per hour (4.65 MMBtu/hr) and 4.65 million British thermal units per hour (4.65 MMBtu/hr) heat input boilers shall each be limited to 0.8 pounds per million British thermal unit (0.8 lb/MMBtu) heat input.

PVC Plug Molders

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from each of the thirty (30) PVC Plug Molders emission units (Emission units 25 through 54) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Soldering Stations

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from each of the eleven (11) soldering stations (Emission units 85 through 90, 92 through 95, and 98) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Brazing Station

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from the one (1) brazing station (Emission unit 91) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Metal Presses

326 IAC 6-3-2 (Process Operations)
Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from the twenty-four (24) metal presses (Emission units 1 through 24) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Abrasive Blaster

326 IAC 6-3-2 (Process Operations)
Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from the one (1) Maintenance Abrasive Blaster shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Drying Ovens

326 IAC 6-3-2 (Process Operations)
Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from the two (2) drying ovens shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Natural gas / Propane fuel combustion sources

Pursuant to 326 IAC 6-2-4(a), Particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

Pt = 1.09/Q^0.26 Where Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu/hr) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill

the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(1) The plastic and metal parts coating facilities have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.

(b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 1-5)

Conclusion

The operation of this plastic and metal automotive parts manufacturing shall be subject to the conditions of the attached proposed Part 70 Permit No. T077-7670-00003.

Appendix A: Emissions Calculations
Potential VOC and Particulate Emissions
From Plastic Parts Coating Operations

Company Name: Grote Manufacturing Company, Inc.
Address City IN Zip: 2600 Lanier Drive, Madison, IN 47250
CP: 077-7670
Plt ID: T077-0003
Reviewer: Lynn Nieman
Date: 01/22/99

Spray HMSL and Plastic Parts Booth (EU78)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Cypress	8.9	60.00%	0.0%	60.0%	0.0%	23.90%	0.00350	1200.000	5.34	5.34	22.42	538.08	98.19	32.73	22.33	50%
Ivory	9.6	54.00%	0.0%	54.0%	0.0%	46.00%	0.00350	1200.000	5.17	5.17	21.71	521.04	95.09	40.50	11.24	50%
Light Graphite	8.4	43.00%	0.0%	43.0%	0.0%	57.00%	0.00350	1200.000	3.61	3.61	15.15	363.60	66.34	43.97	6.33	50%
Mocha	9.2	58.00%	0.0%	58.0%	0.0%	24.70%	0.00350	1200.000	5.32	5.32	22.34	536.16	97.86	35.43	21.54	50%
Cordovan	8.1	66.90%	0.0%	66.9%	0.0%	22.70%	0.00350	1200.000	5.41	5.41	22.72	545.28	99.53	24.62	23.83	50%
Willow	8.2	63.10%	0.0%	63.1%	0.0%	25.90%	0.00350	1200.000	5.20	5.20	21.85	524.40	95.72	27.99	20.09	50%
Parabolic Lens Coat	7.6	56.00%	0.0%	56.0%	0.0%	33.30%	0.00350	1200.000	4.27	4.27	17.92	430.08	78.50	30.84	12.81	50%
			Add worst case coating to all solvents								**22.72**	**545.28**	**99.53**	**43.97**		

Hand Spray Plastic Parts Booth (EU79)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Argent Decorative	7.7	79.00%	0.0%	79.0%	0.0%	21.00%	0.01200	250.000	6.08	6.08	18.25	438.00	79.93	10.62	28.97	50%
			Add worst case coating to all solvents								**18.25**	**438.00**	**79.93**	**10.62**		

Upspray Machine Plastic Parts Booth (EU81)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Black Hi-Color	9.8	47.20%	0.0%	47.2%	0.0%	35.90%	0.00350	300.000	4.64	4.64	4.88	117.12	21.36	11.95	12.94	50%
Reflective Aluminum	8.1	54.80%	0.0%	54.8%	0.0%	37.00%	0.00350	300.000	4.44	4.44	4.66	111.84	20.41	8.42	12.00	50%
Primer	8.1	69.60%	0.0%	69.6%	0.0%	30.40%	0.00350	300.000	5.64	5.64	5.92	142.08	25.93	5.66	18.54	50%
			Add worst case coating to all solvents								**5.92**	**142.08**	**25.93**	**11.95**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Potential VOC and Particulate Emissions
From Metal Parts Coating Operations

Paint Spray Both #1 (EU82)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Silver bake enamel	8.1	39.90%	0.0%	39.9%	0.0%	59.10%	0.00800	2750.000	3.25	3.25	71.43	1714.32	312.85	235.62	5.49	50%
Black bake enamel	8.5	40.00%	0.0%	40.0%	0.0%	60.00%	0.00800	2750.000	3.40	3.40	75.20	1804.80	329.40	245.72	5.67	50%
White bake enamel	10.3	43.00%	0.0%	43.0%	0.0%	57.00%	0.00800	2750.000	4.43	4.43	98.45	2362.80	431.21	282.86	7.77	50%
New Post Office white	12.0	29.00%	0.0%	29.0%	0.0%	71.00%	0.00800	2750.000	3.48	3.48	76.61	1838.64	335.56	410.49	4.90	50%
White polyester enamel	11.8	29.60%	0.0%	29.6%	0.0%	70.30%	0.00800	2750.000	3.49	3.49	75.67	1816.08	331.42	400.24	4.97	50%
Lilly- olive drab	10.1	42.80%	0.0%	42.8%	0.0%	57.10%	0.00800	2750.000	4.32	4.32	79.27	1902.48	347.22	278.35	7.57	50%
White powder primer	8.6	81.60%	0.0%	81.6%	0.0%	25.30%	0.00800	2750.000	7.02	7.02	160.31	3847.44	702.16	76.24	27.74	50%
			Add worst case coating to all solvents								**160.31**	**3847.44**	**702.16**	**410.49**		

Paint Spray Booth #2 (EU83)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Silver bake enamel	8.1	39.90%	0.0%	39.9%	0.0%	59.10%	0.00800	2750.000	3.23	3.23	71.43	1714.32	312.85	234.55	5.47	50%
Black bake enamel	8.5	40.00%	0.0%	40.0%	0.0%	60.00%	0.00800	2750.000	3.40	3.40	75.20	1804.80	329.40	245.72	5.67	50%
White bake enamel	10.3	43.00%	0.0%	43.0%	0.0%	57.00%	0.00800	2750.000	4.43	4.43	98.45	2364.00	431.21	282.86	7.77	50%
New Post Office white	12.0	29.00%	0.0%	29.0%	0.0%	71.00%	0.00800	2750.000	3.48	3.48	76.61	1838.64	335.56	410.49	4.90	50%
White Polyester Enamel	11.6	29.60%	0.0%	29.6%	0.0%	70.30%	0.00800	2750.000	3.43	3.43	75.67	1815.36	331.42	393.46	4.88	50%
Red Oxide Primer	10.1	42.80%	0.0%	42.8%	0.0%	57.10%	0.00800	2750.000	4.32	4.32	79.27	1902.48	347.22	278.35	7.57	50%
White Powder Primer	8.6	81.60%	0.0%	81.6%	0.0%	25.30%	0.00800	2750.000	7.02	7.02	160.31	3847.68	702.16	76.24	27.74	50%
			Add worst case coating to all solvents								**160.31**	**3487.68**	**702.16**	**410.49**		

Paint Spray Booth #2 (EU84)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Silver bake enamel	8.1	39.90%	0.0%	39.9%	0.0%	59.10%	0.00180	2750.000	3.23	3.23	16.07	385.68	70.39	52.77	5.47	50%
Black bake enamel	8.5	40.00%	0.0%	40.0%	0.0%	60.00%	0.00180	2750.000	3.40	3.40	16.92	406.08	74.11	55.29	5.67	50%
White bake enamel	10.3	43.00%	0.0%	43.0%	0.0%	57.00%	0.00180	2750.000	4.43	4.43	22.15	532.32	97.02	63.64	7.77	50%
New Post Office white	12.0	29.00%	0.0%	29.0%	0.0%	71.00%	0.00180	2750.000	3.48	3.48	17.24	413.76	75.50	92.36	4.90	50%
White poleyester Ename	11.6	29.65%	0.0%	0.0%	0.0%	70.35%	0.00180	2750.000	0.00	0.00	17.03	408.72	74.57	88.46	4.89	50%
Lilly- olive drab	10.1	42.80%	0.0%	42.8%	0.0%	57.10%	0.00180	2750.000	4.32	4.32	17.84	428.16	78.12	62.63	7.57	50%
White powder primer	8.6	81.60%	0.0%	81.6%	0.0%	31.60%	0.00180	2750.000	7.02	7.02	36.07	865.68	157.99	17.15	22.21	50%
			Add worst case coating to all solvents								**36.07**	**865.68**	**157.99**	**92.36**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Potential Emissions

Emission Unit	VOC (tpy)	PM (tpy)	PM10 (tpy)	SO2 (tpy)	NOx (tpy)	CO (tpy)
			PLASTIC PARTS			
78	99.53	43.97	43.97	0	0	0
79	79.93	10.62	10.62	0	0	0
81	25.93	11.95	11.95	0	0	0
Total Plastic=	205.39	66.54	66.54	0	0	0
			METAL PARTS			
82	702.16	410.49	410.49	0	0	0
83	702.16	410.49	410.49	0	0	0
84	157.99	92.36	92.36	0	0	0
Total Metal=	1562.31	913.34	913.34	0	0	0
TOTAL =	**1918.21**	**979.88**	**979.88**	**0**	**0**	**0**

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Grote Industries Incorporated
Address City IN Zip: 2600 Lanier Drive
CP #: T077-7670
Plt ID: T077-7670-00003
Permit Reviewer: Lynn Nieman
Date: 01/26/99

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Benzene	Weight % Chromium	Weight % Methyl Ethyl Ketone	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Chromium Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Methanol Emissions (ton/yr)
PLASTIC PARTS																	
Mocha	9.172	.0035	1200.00	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	8.44	0.00	0.00	0.00	0.00	0.00	0.00
Parabolic Lens Coat	7.62	0.003500	1200.00	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	7.01	0.00	0.00	0.00	0.00	0.00
Argent	7.7	0.012000	250.00	0.00%	0.00%	0.00%	0.00%	0.00%	16.00%	14.00%	0.00	0.00	0.00	0.00	0.00	16.19	14.16
UV Clear	7.4	0.003000	1800.00	0.00%	2.00%	0.00%	0.00%	0.00%	24.00%	0.00%	0.00	3.50	0.00	0.00	0.00	42.01	0.00
Black Hi Color	9.84	0.003500	300.00	20.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	9.05	9.05	0.00	0.00	0.00	0.00	0.00
Reflective Aluminum	8.1	0.003500	300.00	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	14.90	0.00	0.00	0.00	0.00	0.00	0.00
METAL PARTS																	
Black Bake Enamel	8.546	0.008000	2750.00	20.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	164.70	0.00	41.17	0.00	0.00	0.00	0.00
White Bake Enamel	10.407	0.008000	2750.00	0.00%	0.00%	7.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	70.20	0.00	0.00	0.00	0.00
Post Office White	12	0.008000	2750.00	6.83%	2.95%	0.00%	0.00%	0.00%	0.00%	0.00%	78.98	34.11	0.00	0.00	0.00	0.00	0.00
Red Oxide Primer	11.9	0.008000	2750.00	1.91%	0.00%	0.00%	0.00%	0.78%	0.00%	0.00%	21.90	0.00	0.00	0.00	8.94	0.00	0.00
White Powder Primer	8.93	0.008000	2750.00	0.00%	1.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	14.63	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions											**297.96**	**68.30**	**111.37**	**0.00**	**8.94**	**58.19**	**14.16**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Grote Industries Incorporated
Address City IN Zip: 2600 Lanier Drive
CP: 077-7670
Plt ID: 7596
Reviewer: Lynn Nieman
Date: 01/26/99

Boiler ID Emission Unit	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
96	4.65	
97	4.65	81.468
Total MMBtu/hr	9.3	

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 *see below	5.5	84.0
Potential Emission in tons/yr	0.3	0.3	0.0	4.1	0.2	3.4

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
)0, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 2 for HAPs emissions calculations.

Appendix A: Emission Calculations
LPG - Propane - Industrial Boilers
Heat input capacity: < 10 MMBtu/hr

Company Name:	Grote Industries
Address City IN Zip:	2600 Lanier Drive, Madison, Indiana, 47250
Plt ID:	077-7670-00003
Reviewer:	Lynn Nieman
Date:	04-13-99

Boilers - EU96, EU97

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S
		S = Sulfur content = 0.00 grains/100ft^3
9.30	890.36	

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.0 *(0.10S)*	14.0	0.5 *TOC value	1.9
Potential Emission in tons/yr	0.2	0.2	0.0	6.2	0.2	0.8

*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
(Source - AP-42 (Supplement B 10/96) page 1.5-1)
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Appendix A: Emission Calculations
HAP Emission Calculations

Mask Washer

Company Name: Grote Industries
Address City IN Zip: 2600 Lanier Drive, Madison, Indiana 47250
Plt ID: 077-7670-00003
Permit Reviewer: Lynn Nieman
Date: 04-13-99

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Ethyl Benzene	Weight % MIBK	Weight % Benzene	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Benzene Emissions (ton/yr)	Methanol Emissions (ton/yr)
Solvent 22-30	7.07	0.583000	1.25	0.10%	68.00%	21.00%	0.10%	9.00%	0.10%	0.00%	0.02	15.35	4.74	0.02	2.03	0.02	0.00
Total State Potential Emissions											**0.02**	**15.35**	**4.74**	**0.02**	**2.03**	**0.02**	**0.00**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

hapcalc.wb3

VOC and Particulate Emissions

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Solvent 22-30	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.58300	1.250	7.07	7.07	5.15	123.65	22.57	20.40	ERR	0%

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

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